

EXHIBIT 56



THE TIMES AND YOUR DATA

Privacy Policy

The New York Times Company Privacy Policy

Last Updated on July 01, 2021

At The Times, our mission is to seek the truth and help people understand the world. We want you to understand how we handle your data. We also want you to know your rights and choices.

This policy describes how we handle your data when you use “Times Services,” listed below:

- The New York Times newspaper, plus our International Edition
- Our websites, *like nytimes.com*
- Our apps, *like the New York Times app and the New York Times Crossword app*
- Our email newsletters, *like Cooking and Morning Briefing*
- Our pages or ads on social media networks, *like our Facebook and Instagram pages*

- Anywhere we gather information from you and refer you to this Privacy Policy



How we handle information about you depends on which Times Services you use — and how you use them. We use different information about print subscribers than website visitors.

Be aware that certain Times Services work differently. Some have additional terms that supplement this policy (e.g., *Reader Submissions*). Others refer to a different privacy policy altogether, so this one does not apply.



1. What Information Do We Gather About You?



The information we gather about you depends on the context. By and large, it's information about you that can personally identify you — either on its own or when combined with other information.

The following describes the information we collect and how we obtain it.

A) Information Collected Through Times Services.

i. Information You Voluntarily Give Us

- **For Registration:**

When you sign up for a Times Service (e.g., a *subscription*), we collect your contact information and account credentials. Once you're registered, we assign you a unique ID number. This ID number helps us recognize you when you're signed in.

For some Times Services, you can instead sign up by linking your Apple, Facebook or Google account. See "From Other Sources" below.

If you register for an event or conference, we might ask for additional information (e.g., *your company name, your job title or your dietary restrictions*).

- **For Billing:**

To process payments or donations, we collect and use your payment information.

This can include your name, your address, your telephone number, your email address, your credit or debit card information and any other relevant information.

- **For User-Generated Content:**

We offer you the ability to post content that other users can read (e.g., *comments or recipe reviews*). Anyone can read, collect and use any personal information that accompanies your posts. See the Comments F.A.Q., or read “User-Generated Content” in our Terms of Service for more information.

We do not have to publish any of your content. If the law requires us to take down, remove or edit your personal information, we will comply to the required extent.

- **For Contests, Sweepstakes and Special Offers:**

When you sign up for these, you give us your name, email and any other required information.

- **For Reader Surveys, Research, Panels and Experience Programs:**

We gather information through questionnaires, surveys and feedback programs. We also conduct similar research for advertisers. We ask you for your consent to use this information when you participate in these programs and events.

- **During Contact With Our Call Centers:**

We collect information from you when you place an order over the phone or contact customer service through one of our toll-free numbers.

- **Personal Contacts Data:**

We never scan your device for your contacts or upload that data.

With your consent, we do comply with your requests to collect data about your friends, family or acquaintances (e.g., *Refer a Friend campaigns*). This functionality is only meant for U.S. residents. By using it, you acknowledge and agree that both you and your contacts are based in the United States — and that you have everyone’s consent for us to use their contact information.

ii. Information Collected Automatically

- **With Tracking Technologies in Your Browser and Mobile Apps:**

These technologies include cookies, web beacons, tags and scripts, software development kits (or SDKs) and beyond.

We track and store data about how you visit and use Times Services, particularly through our websites and apps. The items we log include:



- Your IP address
- Your location
- Your operating system
- Your browser
- Your browser language
- The URLs of any pages you visit on our sites and apps
- Device identifiers
- Advertising identifiers
- Other usage information.

We combine this data with other information we collect about you. For more information about tracking methods on Times Services, and how to manage them, read our [Cookie Policy](#).

If your browser doesn't accept our cookies, you can't access certain parts of our websites (e.g., *your account on nytimes.com*). Because the "Do Not Track" browser-based standard signal has yet to gain widespread acceptance, we don't currently respond to those signals. Note that, if you are a California resident, you can exercise your opt out right by turning your browser on "Do Not Track"; for more info, please see below. We however respond to the Global Privacy Control in certain territories, such as Europe and California.

- **With GPS Technologies:**

Some of our apps can provide content based on your GPS location, if you enable this feature (e.g., *the New York Times Real Estate app*). Your GPS location is your exact location.

You choose whether to enable GPS features when you first install the app. You can edit that setting on your device at any time. If you enable these features, your GPS location can be found by satellite, cell phone tower or Wi-Fi and used by the app. If you save a location-based search in your history, that data moves to our service provider's servers — see below for the definition of service provider.

If you do not enable GPS location-based services, or if a specific app does not have location-based features (e.g., *the New York Times app*), we don't collect your precise GPS location. We do collect your IP address, which can establish your approximate location. Ads on our sites and apps may be targeted based on this approximate location, but are never targeted based on your GPS location.

B) Information Collected From Other Sources.**i. Privately Owned Databases:**

Marketing, data analytic and social media-owned databases give us access to a range of information — like public data, survey data and beyond. This data sometimes includes your mailing address, your gender, your age, your household income and other demographic data.

ii. Social Media Platforms and Other Third-Party Services:

(Social media platforms include Facebook. Third-party services include Google and Nook.)

You can link your social media or other third-party account to a Times Service. By linking the services, you authorize us to collect, store and use any information they may give us (e.g., your email address). You can disconnect your nytimes.com registration from third-party accounts at any time.

We also receive information from you when you interact with our pages, groups, accounts or posts on social media platforms. This includes aggregate data on our followers (e.g., age, gender and location), engagement data (e.g., “likes,” comments, shares, reposts and clicks), awareness data (e.g., number of impressions and reach) and individual users’ public profiles.

For more information, refer to our social login and Nook F.A.Q.

iii. Workplace and Schools:

When your employer or school buys an organizationwide subscription to nytimes.com, they sometimes provide us with your name and organization email address to grant you access as a user.

A note about future updates:

We are always improving our products and services, and we create new features regularly. These updates sometimes require us to collect new information, or use what we already have differently. If there is a significant or material change in the way we handle your personal information, we will notify you as detailed below.

Back to top

2. What Do We Do With The Information We Collect About You?**A) We provide the Times Services.**

We use your information to help you use and navigate Times Services, such as:



- Making a Times Service available to you
- Arranging access to your account
- Providing customer service
- Responding to your inquiries, requests, suggestions or complaints
- Completing your payments and transactions
- Sending service-related messages (e.g., *a change in our terms and conditions*)
- Saving your reading list, recipes or property searches
- Displaying your Crossword stats
- Letting you take part in paid services, polls, promotions, surveys, panels, research and comments.

B) We Personalize Your Experience.

We track your interests and reading habits (e.g., *the articles you read*) to personalize your reading experience using technology like algorithmic recommendations and machine learning. This is how we highlight articles you might be interested in and de-emphasize articles you've already read. For more information about content personalization on Times Services, you can read the Personalization F.A.Q. We also show you prices, promotions, products or services we believe you'll find interesting, based on demographic and usage data.

C) We Allow You to Share User-Generated Content.

Any information you disclose in your content becomes public — along with your chosen screen name and uploaded photo.

D) We Develop Products and Services, and Do Analysis.

We analyze data on our users' subscription, purchase and usage behaviors. This helps us make business and marketing decisions.

For example, our analysis lets us predict preferences and price points for our products and services. It helps us determine whether our marketing is successful. It also shows us characteristics about our readers, which we sometimes share in aggregate with advertisers.

Google Analytics is one of the analytics providers we use. You can find out how Google Analytics uses data and how to opt out of Google Analytics.

E) We Carry Out Administrative Tasks.

- For auditing: We verify that our internal processes work as intended and comply with legal, regulatory and contractual requirements.
- For fraud and security monitoring: We detect and prevent cyberattacks or unauthorized robot activities.
- For customer satisfaction: We assess users' satisfaction with Times Services and our customer care team.

The above activities can involve outside companies, agents or contractors ("service providers") with whom we share your personal information for these purposes (discussed further below).

F) We Offer Sweepstakes, Contests and Other Promotions.

You can take part in our sweepstakes, contests and other promotions. Some might have additional rules about how we use and disclose your personal information.

G) We Allow for Personalized Advertising on Times Services and Create Audiences for Third-Party Advertisers.

We gather data and work with third parties to show you personalized ads on behalf of advertisers. This data comes from ad tracking technologies set by us or the third party (e.g., cookies), the information you provide (e.g., your email address), your use of Times Services (e.g., your reading history), information from advertisers or advertising vendors (e.g., demographic data) and anything inferred from any of this information. We only use or share this information in a manner that does not reveal your identity. For example, we use Google to serve ads on Times Services. Google uses cookies or unique device identifiers, in combination with their own data, to show you ads based on you visiting nytimes.com and other sites. You can opt out of the use of the Google cookie by visiting the related Google privacy policy.

We also identify groups of users to whom to serve personalized ads on behalf of our advertisers. To do this, we combine information we collect through surveys or registration with information we collect automatically using tracking technologies while you browse our sites and apps. This combined information is used to build models. These data models are then used to measure users' attributes, like their demographic information or their interests. Working with service providers, we use these measurements to group users by common attributes. Each group is associated with a random ID which is then passed to our ad server for use in targeting ad campaigns on our sites and apps.

Another example is our affiliate link vendors, which we use in our guides and product recommendations. Times Services include links that will send you to vendor URLs and other services not operated or controlled by us. These vendors use cookies and other technologies to collect information about your navigation from the Times Services to the merchant you are visiting. If you buy a product after following a link to a link vendor's URL, we may earn a commission.

Additional notes:

- For more about targeted advertising, and how to opt out with your specific browser and device, go to the DAA Webchoices Browser Check and NAI Opt Out of Interest-Based Advertising. You can download the AppChoices app to opt out in mobile apps. You can also follow the instructions in the What Are Your Rights? section below.
- We try to limit how our third-party advertising technology vendors use the information they gather from you. Many of these providers require us to enter into contracts that allow them to optimize their own services and products, or that help them create their own.

Essentially, these providers combine any information they gather about you through Times Services with information they receive from their other clients. This helps them target ads to you on behalf of their other clients, not just us.

- These third parties sometimes use other services in order to serve ads; check their privacy policies for more details. For further information on tracking technologies and your rights and choices regarding them, see the applicable Cookie Policy. Effective January 1, 2020, California residents have the right to instruct us not to "sell" their personal information. More information is available see below.

H) We Advertise Times Services to You.

We market our properties to you. Sometimes we use marketing vendors to do this.

We serve ads through websites, locations, platforms and services operated and owned by third parties. Often these ads are targeted at people who have visited or registered for a Times Service but have not subscribed or purchased anything. The ads are also targeted at people with similar traits or behaviors to our subscribers or customers.

We target our advertising to these users by uploading an encrypted customer list to a third party, or by incorporating a tracking technology from a third party onto our Times Service. The third party then matches individuals who appear in both our data and their data. Because of how this matching process works, the third party can't read our encrypted customer list if they don't already have it. We will also opt you out of such matched ads if you are a California resident and you exercise your right not to have your personal information "sold" after January 1, 2020, as discussed further see below.

To opt out of receiving these matched ads, contact the applicable third parties. For example, when we use “Custom Audience” to serve you our ad through Facebook, you should be able to hover over the box in the right corner of that Facebook ad and opt out. We are not responsible for any third party’s failure to comply with opt-out requests.

We periodically send you targeted email newsletters or promotional emails. For information on opting out of these emails, see What Are Your Rights?

I) We Aggregate (or De-identify) Personal Information Into Larger Findings.

Sometimes we aggregate or de-identify information so that it can no longer identify you, under applicable laws. This helps us better understand and represent our users, such as when we measure ad performance, create advertising interest-based segments or compile survey results. We can use and disclose this aggregated or de-identified information for any purpose, unless an applicable law says otherwise.

Back to top

3. With Whom Do We Share the Information We Gather?

A) Within The New York Times Company:

We share your information with our affiliates for the purposes listed here. See a list of our affiliates.

B) With Service Providers:

We work with service providers, as defined above, to carry out certain tasks:

- Processing your payments
- Fulfilling your orders
- Maintaining technology and related infrastructure
- Offering you customer service
- Serving and targeting ads
- Measuring ad performance
- Presenting surveys

- Shipping you products and mailings
- Distributing emails
- List processing and analytics
- Managing and analyzing research
- Managing promotions



When performing these tasks, service providers often have access to your personal information.

We sometimes allow them to use aggregated or de-identified information for other purposes, in accordance with applicable laws

C) With Other Third Parties:

There are situations when we share your information with third parties beyond our service providers. We never share your email address with these third parties without your consent, except in encrypted form to engage in the matched ads process described above.

- i. If you're a U.S. print subscriber, we may share your name and mailing address (among other information) with other reputable companies that want to market to you by mail.

This may be a "sale" of personal information under California law effective January 1, 2020. If you prefer we don't share this information, refer below to "What Are Your Rights?".

- ii. We share information about our live event and conference attendees (*e.g., your name, your company or your job title*) with the event sponsors. In those cases we notify you when you provide us the information.
- iii. We share information about participants in our sweepstakes, contests and similar promotions with the promotions' sponsors. In those cases we notify you when you provide us the information.
- iv. We process payments you make through Times Services with external services.

There are two ways this can happen:

- We collect your information and share it with the third-party service for processing.
- The third-party service collects your information for processing.

- v. In the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we would have a legitimate interest in disclosing or transferring your information to a third party — such as an acquiring entity and its advisers.
- vi. We can preserve or share personal information if the law requires us to do so. We can also preserve or share personal information if we believe it would be necessary to:
- Comply with the law or with legal process
 - Protect and defend our rights and property
 - Protect against misuse or unauthorized use of the Times Services
 - Protect the safety or property of our users or the general public (e.g., *if you provide false information or attempt to pose as someone else, we could share your information to help investigations into your actions*)
 - Cooperate with government authorities, which could be outside your country of residence.
- vii. We disclose public activities in our RSS feeds, APIs and other distribution formats. Your public activities could thus appear on other websites, blogs or feeds.

Back to top

4. What Are Your Rights?



A) How Do I Opt Out of Email, Phone, Mail and Push Notifications?

The opt-out methods described below are limited to the email address, phone or device used. They won't affect subsequent subscriptions.

i. Email:

We offer a variety of commercial emails and email newsletters. You can unsubscribe from them by following the “unsubscribe” instructions near the bottom of the email. You can also email us at privacy@nytimes.com.

You can manage your [nytimes.com](https://www.nytimes.com) newsletter preferences.

ii. Mail or Telephone Promotions:

You can ask us to unsubscribe from our mail or telephone solicitations. You can also ask us to not share your information with third parties for marketing purposes. To do so, call us at 1-800-698-4637 or chat with us. You may also email us at privacy@nytimes.com with “Opt Out” in the subject line, and your account number and phone number in the body of the email.

For International Edition customers, you can write us at: *The New York Times International Edition, Subscription Dept. 18 Museum Street, London, WC1A 1JN, United Kingdom*. Please include your account number and phone number in the body of the letter.

iii. Push Notifications:

You can opt out any time by adjusting your device settings, or uninstalling our app.

iv. Text Messages:

You can opt out of text alerts any time by replying “STOP,” or any alternative keyword we’ve shared with you.

We complete any opt-out request as quickly as we can. This opt-out request won’t prohibit us from sending you important nonmarketing notices.

B) How Do You Access, Change, Delete, Update or Exercise Your Other Rights in Relation to Your Personal Information?

In some parts of the world, you have the right to:

- Access, modify, or delete the personal information we have about you
- Receive an electronic copy of the personal information we have about you, for data portability
- Restrict, or object to, how we process personal information about you
- Not receive discriminatory treatment by us for the exercise of your privacy rights.

You have the right to object to the processing of your personal information based on our legitimate interest or that of a third party — unless we demonstrate compelling legitimate grounds for the processing of, or the keeping of, your personal information for the establishment, exercise or defense of legal claims.

If you'd like to exercise any of the above rights, contact us via this form or by calling us at our toll-free number, 1-800-NYTIMES. In your request, please be specific. State the information you want changed, whether you'd like your information suppressed from our database or whether there are limitations you'd like us to put on how we use your personal information. Please use the email address linked to that personal information — we only complete requests on the information linked to your email address. To verify your identity, we will email the email address you provide us, and which matches our records, and wait for your response. In some instances we may also ask for additional information. This is how we verify your identity before complying.

You can designate an authorized agent to make a request on your behalf. In order to do that, please provide the agent with written permission, signed by you, authorizing the agent to submit the request on your behalf. The agent must submit that written permission along with the request. We will contact you to verify your identity — and the authorized agent's permission — before a response to the request is sent.

We'll respond to your request in a manner consistent with applicable law.

We might need to keep certain information for recordkeeping purposes, or to complete a transaction you began prior to requesting a change or deletion (*e.g., if you make a purchase or enter a promotion, you might not be able to change or delete the personal information provided until after the completion of the purchase or promotion*).

In some cases, your request doesn't ensure complete removal of the content or information (*e.g., if another user has reposted your content*).

If you'd like, you can lodge a complaint with a data protection authority. A list of E.U. data protection authorities is available.

C) How Do You Manage Your Digital and Home Delivery Accounts?

You can update your account information and see your transaction history (for International Edition print subscribers). If you need assistance, call our toll-free number, 1-800-NYTIMES. Other local numbers are available.

It works differently if you subscribed via Apple's App Store or Google Play. Register with us to access the Account area, and contact Apple or Google for your transaction history.

D) What Are Your California Shine the Light Privacy Rights?

Under the California "Shine the Light" law, California residents can opt out of our sharing of their information to third parties (and sometimes affiliates) for their direct marketing purposes.

To do so, email us at privacy@nytimes.com with “Shine the Light Opt Out” in the subject line, and your account number and phone number in the body of the email. You can also write to us at: Customer Care/Call Center 620 Eighth Avenue, New York, NY 10018, Attn: Postal. Include your account number and phone number in the body of the letter.

E) What Are My California “Do Not Sell My Personal Information” Rights?

If you’re a California resident, you can request that we stop sharing your personal information with third parties who are not our service providers (in accordance with the California Consumer Privacy Act). To opt out, click the following link: [Do Not Sell My Personal Information](#), set your browser on “Do Not Track,” turn on Global Privacy Control in your browser or email us at privacy@nytimes.com with the subject line “California Resident - Do Not Sell.” If you opt out using a “Do Not Track” or Global Privacy Control signal in your browser or extensions, please note the opt out will only apply to the specific browser from which you send the “Do Not Track” or Global Privacy Control signal.

F) What Are My California Non-Discrimination Rights?

You may exercise any of your rights listed in this section without fear of unlawful discrimination.

G) Record of Requests

We keep a record of requests that we received from California residents between January 1, 2020, and December 31, 2020.

For data deletion and data access requests, our readers submit requests through our intake form. In the intake form, they mark whether they reside in California. We then send an identity verification email to the user. If the user does not verify their identity in 45 days, their request will be denied. If the user does verify in 45 days, we begin to fulfill their request.

We have calculated our median process time for verified data deletion and data access requests. Any requests completed within the same day are rounded to one day. The median process time is found by organizing the processing time of each verified request from lowest to highest. The middle number is the median.

Request Type	Total Requests Received From California Residents*	Number of Denied Requests Due to No Verification*	Number of Verified Requests*	Median Process Time for Verified Requests in Days**
Deletion (requests to delete)	873	268	605	3
Access (requests to know)	70	32	38	196***

* Requests that we received from California residents between January 1, 2020, 00:00 UTC and December 31, 2020, 23:59 UTC.

** Numbers are rounded to the nearest whole number. Numbers below .5 are rounded down and the numbers .5 or above are rounded up.

***Due to difficulties in integrating a number of legacy data systems into the system that processes these requests, we have regularly been noticing unacceptable delays in processing time. We are working to address these issues with a view to resolving them as soon as possible.

Request Type	Total Requests*	Median Process Time in Seconds**
Right to Opt Out of Sale of Personal Information	129456	0.6

* Requests that we received from California residents between January 1, 2020, 00:00 UTC and December 31, 2020, 23:59 UTC.

** Numbers are rounded to the nearest tenth. Numbers below .05 are rounded down and the numbers .05 or above are rounded up.

Back to top

5. What About Sensitive Personal Information?

We generally don't want to gather any sensitive information about you. This includes:

- Your social security number
- Your racial or ethnic origin
- Your political opinions
- Your religion or other beliefs
- Your health, biometric or genetic characteristics
- Any trade union membership
- Any criminal background

There are rare situations when we request this information (e.g., a reader survey asks about your political leanings), but you can decline to answer. Outside those situations we would prefer you never share that information with us.

Back to top

6. How Long Do You Retain Data?

It depends. We store your personal information for as long as needed, or permitted, based on the reason why we obtained it (consistent with applicable law). This means we might retain your personal information even after you close your account with us.

When deciding how long to keep your information, we consider:

- How long we have had a relationship with you or provided a Times Service to you
- Whether we are subject to any legal obligations (e.g., any laws that require us to keep transaction records for a certain period of time before we can delete them)
- Whether we have taken any legal positions (e.g., in connection with any statutes of limitation).

Rather than delete your data, we might de-identify it by removing identifying details.

Back to top

7. How Do You Protect My Information?

We protect your personal information with a series of organizational, technological and physical safeguards — but we cannot guarantee its absolute security. We recommend that you use complex and unique passwords for your Times accounts and for third-party accounts linked to them. Do not share your password with anyone.

If you have reason to believe your interaction with us is no longer secure, notify us immediately.

Back to top

8. Are There Guidelines for Children?

Times Services are intended for a general audience, and are not directed at children under (13) years of age.

We do not knowingly gather personal information (as defined by the U.S. Children's Privacy Protection Act, or COPPA) in a manner not permitted by COPPA. If you are a parent or guardian and you believe we have collected information from your child in a manner not permitted by law, contact us at privacy@nytimes.com. We will remove the data to the extent required by applicable laws. In California we do not knowingly "sell" the personal information of minors under 16 years old (to understand what "sell" means).

If you're a California resident under 18 years old and you're registered with a Times Service, you can ask us to remove content or information you've posted to a Times Service. Email us at privacy@nytimes.com with "California Under 18 Content Removal Request" in the subject line, and tell us what you want removed. We will make reasonable efforts to remove the post from public view, although we cannot ensure the complete removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Back to top

9. How Is Information Transferred Internationally?

The New York Times Company is headquartered in the United States. If you are located outside the United States, your information is collected in your country and then transferred to the United States — or to another country in which we (or our affiliates or service providers) operate.

If we transfer your data out of the European Economic Area (E.E.A.), we implement at least one of the three following safeguards:

- We transfer your information to countries that have been recognized by the European Commission as providing an adequate level of data protection according to E.E.A. standards (see the full list of these countries).
- We use a service provider in the United States that is Privacy Shield certified.
- We take steps to ensure that the recipient is bound by E.U. Standard Contractual Clauses to protect your personal data. You can see a copy of these clauses.

In certain situations, the courts, law enforcement agencies, regulatory agencies or security authorities in those countries might be entitled to access your personal information.

Back to top



10. What Is Our Legal Basis?



In some jurisdictions, like the European Union and the European Economic Area, we only collect, use or share information about you when we have a valid reason. This is called “lawful basis.” Specifically, this is one of the following:

- The consent you provide to us at the point of collection of your information
- The performance of the contract we have with you
- The compliance of a legal obligation to which we are subject or
- The legitimate interests of The Times or a third party. “Legitimate interest” is a technical term under international laws, including the European Union General Data Protection Regulation. It means that there are good reasons for the processing of your personal information, and that we take measures to minimize the impact on your privacy rights and interests. “Legitimate interest” also refers to our use of your data in ways you would reasonably expect and that have a minimal privacy impact.

We have a legitimate interest in gathering and processing personal information, for example: (1) to ensure that our networks and information are secure; (2) to administer and generally conduct business within The New York Times Company; (3) to prevent fraud; and (4) to conduct our marketing activities.

Back to top

11. What About Links to Third-Party Services?



Some Times Services contain links to third-party websites, resources, vendors and advertisers. These third parties are not Times Services. We do not control (and are not responsible for) third party content or privacy practices. Any personal data you provide to them is not covered by this Privacy Policy.

Back to top



12. How Are Changes to This Privacy Policy Communicated?

We periodically update this Privacy Policy. We will post any changes on this page by updating this policy.

If we make a significant or material change in the way we collect, use or share your personal information, we will notify you at least 30 days prior to the changes taking effect. We will do this via email or prominent notice within Times Services. If you object to any change, you can stop using the Times Services.

After we post any changes on this page, your continued use of Times Services is subject to the updated Privacy Policy.

Back to top

13. How Can You Contact Us? Who Is the Controller of Your Personal Information?



If you have any questions, email us at privacy@nytimes.com or write us at:

The New York Times Company
620 Eighth Avenue
New York, N.Y. 10018
Attn.: Privacy Counsel

We can also be reached by phone at 1-800-NYTIMES (see a a list of our local telephone numbers outside the United States).

The New York Times Company is referred to in this Privacy Policy as “The Times,” “we” or “our.”

Certain Times Services operate as independent controllers of your personal information. Wirecutter operates as an independent controller of personal information collected through the Wirecutter site available at nytimes.com/wirecutter, pages or ads on social media networks, email messages sent by Wirecutter, your offline contacts and any other service offered by Wirecutter (collectively, the “Wirecutter Services”). If you have any questions regarding Wirecutter, email us at privacy@thewirecutter.com or write us at:

Wirecutter, Inc.
c/o The New York Times Company
620 Eighth Avenue

New York, N.Y. 10018

Attn.: Privacy Counsel



Wirecutter operates the Wirecutter Services in accordance with the practices disclosed in this Privacy Policy. With respect to the Wirecutter Services, Wirecutter, Inc. is referred to in this Privacy Policy as included in “The Times,” “we” or “our.” In this Privacy Policy, Wirecutter Services are included under “Times Services.”

Back to top

©2021 The New York Times Company
Do Not Sell My Personal Information

[Privacy F.A.Q.](#) [Privacy Policy](#) [Cookie Policy](#) [California Notice](#) [Third Parties](#) [Terms of Service](#)

EXHIBIT 57



Our **U.S. Consumer Privacy Notice** applies to information that we collect about individuals who seek, apply for, or obtain our financial products and services for personal, family, or household purposes. In addition, our **California Consumer Privacy Act Disclosure** applies to certain information we collect about California residents. For other important information, please visit capitalone.com/privacy.

Collecting, Using, and Sharing Information

[Collapse All](#)



How does Capital One collect information online?

We collect information in a variety of contexts. For example, we may collect information:

- **Directly from you.** We collect information directly from you, such as when you apply or register for our products and services, use our online banking services or mobile apps, communicate with us, respond to surveys, provide feedback, or enter contests or promotions.
- **Automatically when you use our Online Services.** We and others on our behalf may collect Device Data, Online/Mobile Activity Data, and other information automatically when you interact with us online. Learn more about our use of [Online Tracking Technologies](#).

This Privacy Policy applies to information we collect when you use our Online Services. We may combine that information with information we collect in other contexts, such as from our phone calls and emails with you, from third-party data sources for fraud prevention, identity verification, or marketing purposes, from our co-branded card or business partners, and from publicly available data sources. We will treat such combined information in accordance with this Privacy Policy.



What information does Capital One collect?

Depending on how you interact online with us, we may collect various types of information. For example, when you sign up for or use a financial product or service online, we may collect:

- **Contact or identity data**, such as your name, mailing address, email address, phone number, date of birth, government-issued identifier (e.g., Social Security number, tax ID number, driver's license, or other government ID), citizenship, username and password, profile picture, and other information that directly identifies you.
- **Account-related data**, such as account number, credit/debit card number, account history, account balances, loan details, vehicle or property information, information about beneficiaries and joint account holders, business-related information (e.g., business name, address, revenue, and industry type), and other information related to your Capital One accounts, applications, or prequalification inquiries.

- **Transaction data**, such as credit/debit card purchases, payment or transaction history, transaction details when you transfer money to or from your Capital One accounts, and third-party billing information or statements.
- **Credit report information**, such as your credit score, credit history, and other information that we receive from credit reporting agencies when you use our Creditwise features or mobile app.
- **Demographic data**, such as gender, marital status, age, household size/composition, education level, income, occupation, and employment status.

When you browse our website or use our mobile apps, we may also collect:

- **Device data**, such as your device type, web browser type and version, operating system type and version, display/screen settings, language preferences, device contacts (e.g., to facilitate Zelle payments), photos (e.g., to deposit checks), internet protocol address, mobile network information, general location (e.g., city, state, or country), precise location (e.g., latitude/longitude to find a nearby Capital One branch, café, or ATM), cookie IDs, device IDs, mobile advertising IDs (e.g., Apple's IDFA or Google's Advertising ID), and likely connections among different browsers and devices that you use (collectively, "Device Data").
- **Online/mobile activity data**, such as login data, search history, information about how you use and interact with our Online Services or advertising (including content viewed, links clicked, and features used), when and how often you use our Online Services, the webpage from which you clicked a link to come to our Online Services (e.g., the referrer URL), and crash reports (collectively, "Online/Mobile Activity Data").
- **Marketing data**, such as your marketing preferences, information about products or services we think you might like, and inferences based on your interactions with us or our partners (e.g., Online/Mobile Activity Data used for targeted advertising).
- **Communications data**, such as your communication preferences and details or the content of your communications with us (e.g., chat messages).
- **Survey and research data**, such as your responses to questionnaires, surveys, requests for feedback, and research activities.

If you inquire about or apply for a job at Capital One, we may also collect:

- **Employment application data**, such as professional, employment-related, and education history collected through the Online Services about job applicants, employees, associates, contractors, or other members of the Capital One workforce.

If you disclose any information relating to other people to us or to our service providers when you visit or use the Online Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.



How does Capital One use this information?

We use information for various purposes depending on how you interact with us. For example, we may use your information for the purposes described below:

- **Providing, maintaining, and servicing your accounts**, such as enabling you to apply for and obtain Capital One products or services, evaluating your application or eligibility for a Capital One product or service, servicing and managing your accounts, providing customer service, communicating with you, and providing online tools and features.
- **Processing transactions and or payments**, such as transferring funds between accounts, processing payments or transactions, fulfilling orders, and conducting settlement, billing, processing, clearing, or reconciliation activities.
- **Verifying your identity**, such as conducting identity verification when you apply for our products or services, authenticating your login credentials, verifying your location to allow access to your accounts, and storing security questions for subsequent verification online or over the phone.
- **Detecting and preventing fraud**, such as determining fraud risk and identifying fraudulent transactions.
- **Protecting against security risks**, such as monitoring network activity logs, detecting security incidents, conducting data security investigations, and otherwise protecting against malicious, deceptive, fraudulent, or illegal activity.
- **Advertising and marketing**, such as sending you offers for special products and services via mail, email, or text message, displaying online advertising, targeting our offers or promotions, conducting market research, and evaluating or improving the effectiveness of our marketing efforts. Learn more about [how we use online tracking technology](#).
- **Conducting analytics and research**, such as examining which parts of our website you visit or which aspects of our mobile apps you find most useful, evaluating user interface and experiences, testing features or functionality, performing debugging and error repair, and analyzing the use of our Online Services. Learn more about [how we use online tracking technology](#).
- **Improving our products and services**, such as personalizing and optimizing your website and mobile experiences, recognizing you across different browsers and devices you use, improving existing products and services, and developing new products and services.
- **Carrying out legal and business purposes**, such as complying with applicable laws, responding to civil, criminal, or regulatory lawsuits, subpoenas, or investigations, exercising our rights or defending against legal claims (including for collections and recoveries on past-due accounts), resolving complaints and disputes, performing compliance activities, analyzing credit risk, conducting credit reporting activities, regulatory reporting, performing institutional risk control, conducting human resources activities, and otherwise operating, managing, and maintaining our business.
- **Using aggregated and de-identified information**, such as using or modifying the information described in this Privacy Policy in a manner that does not allow us to reasonably identify you. For example, we may compile aggregated statistics to understand trends or to research the percentage of users accessing a specific website feature. Information that has been aggregated and de-identified is no longer subject to this Privacy Policy.



How does Capital One share this information?

We share information in a variety of contexts. For example, we may share your information with:

- **Affiliates.** We may share your information with companies in the Capital One family.
- **Business partners.** We may share your information with companies that we have partnered with to offer or enhance products and services for Capital One customers or prospective customers. For example, we may share information with co-branded credit card partners, joint marketing partners, bill pay partners, or retail partners that allow you to redeem credit card rewards.
- **Service providers.** We use other companies to provide services on our behalf and to help us run our business. We may share information with these service providers, or they may collect information on our behalf, for various business purposes. For example, we use service providers for hosting and securing our information systems, servicing customer accounts, detecting and preventing fraud, assisting with human resources activities, communicating with our customers, analyzing and improving our Online Services, and targeting our advertising.
- **Third parties with whom you authorize or direct us to share your information.** We share information with your consent or at your direction. For example, we may share information when you use a third-party service to help manage your financial information across various financial institutions, when you are shopping for financing for a car, when you send money to friends and family via Zelle, or when you transfer funds to another bank.
- **Credit bureaus.** We share information with credit reporting agencies, such as Experian, Transunion, and Equifax, to report on or learn about your financial circumstances and for other lawful purposes.
- **Government entities and others with whom we share information for legal or necessary purposes.** We share information with government entities and others for legal and necessary purposes, such as:
 - To respond to requests from our regulators or to respond to a warrant, subpoena, governmental audit or investigation, law enforcement request, legal order, or other legal process.
 - To facilitate a merger, acquisition, sale, bankruptcy, or other disposition of some or all of our assets, in which case we may transfer your information to the relevant third party.
 - For other legal purposes, such as to enforce our terms and conditions, exercise or defend legal claims, or if we determine that disclosure is necessary or appropriate to protect the life, safety, or property of our customers, ourselves, or others.
- **Recipients of aggregated and de-identified information.** We may share aggregated and de-identified information (such as aggregated statistics regarding the use of our financial products and services) with third parties for any purpose.

Our [U.S. Consumer Privacy Notice](#) provides additional information about how we share information we obtain when offering financial products and services for personal, family, or household use.



What online tracking technology does Capital One use?

We and third-party providers acting on our behalf use a variety of online tools and technologies to collect information when you visit or use the Online Services, including Device Data and Mobile/Online Activity Data. For example, we use these tools to collect information for debugging, fraud prevention, session management, and other necessary purposes. We also use these to conduct **personalization, analytics, and targeted advertising** on or through the Online Services. We may associate this tracking data with your Capital One account (if you have one).

These tools include:

- **Server logs.** Server logs automatically record information and details about your online interactions with us. For example, server logs may record information about your visit to our website on a particular time and day.
- **Cookies.** Cookies are small text files that a website's server stores in your web browser. Cookies allow companies to recognize your device and store information about your account and preferences. For example, we may use cookies to store information about pages visited on our sites, language preferences, your relationship with us, or other information that we have associated with you or your device. You may be able to **manage cookies on your device**.
- **Pixel tags.** A pixel tag (also known as a web beacon, clear GIF, pixel, or tag) is an image or a small string of code that may be placed in a website, advertisement, or email. It allows companies to set or read cookies or transfer information to their servers when you load a webpage or interact with online content. For example, we or our service providers may use pixel tags to determine whether you have interacted with a specific part of our website, viewed a particular advertisement, or opened a specific email.
- **SDKs and mobile advertising IDs.** Our mobile applications may include third-party software development kits ("SDKs") that allow us and our service providers to collect information about your mobile app activity. In addition, some mobile devices come with a resettable advertising ID (such as Apple's IDFA and Google's Advertising ID) that, like cookies and pixel tags, allow us and our service providers to identify your mobile device over time for advertising purposes.
- **Third-party plugins.** Our Online Services may include plugins from other companies, including social media companies (e.g., the Facebook "Like" button). These plugins may collect information, such as information about the pages you visit, and share it with the company that created the plugin even if you do not click on the plugin. These third-party plugins are governed by the privacy policies and terms of the companies that created them.



How does Capital One use online tracking technology to conduct personalization, analytics, and targeted advertising, and how can you opt out?

We and third-party providers acting on our behalf use **online tracking technology** to conduct personalization, analytics, and targeted advertising on or through the Online Services.

- **Personalization.** Capital One may customize content and advertisements for our products and services on our own and third-party websites and mobile apps. In order to make the content and advertising as informative and useful as possible, we may use the information we collect about you online, alone or in combination with information about your relationship with us (such as types of accounts, transactional information, or the state in which you bank). We also use online tracking technologies to recognize your computer or device when you're logged in, enable enhanced features or functionality, improve usability, and otherwise provide the Online Services to you.
- **Analytics.** We and our third-party providers use online tracking technologies to engage in data analytics, auditing, measurement, research, reporting, and debugging on our Online Services and to measure the effectiveness of our advertising. For example, we use Google Analytics on our Online Services for such purposes. You can [learn more about Google Analytics here](#) and [opt out here](#).
- **Targeted advertising.** We and our third-party providers may collect information about your activities on our Online Services and across different websites, mobile apps, and devices over time for targeted advertising purposes. These providers may then show you ads, including across the internet and mobile apps, and other devices, based in part on the information they have collected.

For example, when you visit the Capital One website and explore our products, our advertising providers may use that information to determine which ads to show you when you go to other, non-Capital One websites. Similarly, when you view a Capital One ad on your computer, our advertising providers may use that information when deciding whether to show you a subsequent ad on your laptop or mobile device. For more information about targeted advertising, please see the Network Advertising Initiative's (NAI) [Understanding Online Advertising](#) page.

You may [opt out of certain targeted advertising](#). Please note that you may still receive general advertising from Capital One even after you opt out of targeted advertising.

Opting out relies on information stored in unique browser cookies or mobile or device identifiers, so your opt-out will apply only to the specific browser or device from which you opt out. You will need to opt out separately on all of your browsers and devices. If you delete cookies, change web browsers, reset your mobile advertising ID, or use a different device, you will need to opt out again. You can help preserve web browser opt-out preferences set through the DAA's WebChoices tool by using the ['Protect My Choices'](#) plug-ins.

Your Privacy Rights and Choices

Depending on how you interact with us, you have the ability to make certain choices regarding our collection, use and sharing of your information. Your controls and choices may include:



Review or update your account information

Review or update your account information. You may review or update certain account information by logging into your account online. If you cannot change the incorrect information online, or you prefer to request changes offline, please contact us through [customer support](#), or call or write to us using the contact information listed on your account statements or records.



Unsubscribe from our marketing emails

You can visit our [Email Preferences page](#) to opt out of receiving our marketing emails. Our marketing emails also contain instructions on how to opt out. Please note that you may receive marketing emails from Capital One up to 10 business days after submitting your request. If you opt out of receiving marketing emails, we may still send you emails about your account or for other non-marketing purposes.



Opt out of targeted advertising

You can opt out of certain targeted advertising in web browsers by visiting the [Digital Advertising Alliance \(DAA\) WebChoices Tool](#) (for DAA participating companies), the [NAI Opt Out Page](#) (for NAI member companies), and the [TrustArc Preference Manager](#).

You can opt out of certain targeted advertising in mobile apps by adjusting privacy settings available on your mobile device (e.g., “Limit Ad Tracking” on iOS or “Opt out of Ads Personalization” on Android), or using the [DAA's AppChoices App](#) or the [TRUSTe Privacy App](#) for participating companies.

Learn more about [how we use online tracking technologies](#).



Manage cookies on your device

You may be able to set your web browser to inform you when cookies are set, delete your cookies, or block cookies altogether. Each browser (e.g., Chrome, Safari, Firefox, Internet Explorer) is a little different, so look at your browser's settings or support pages to assist you in managing cookies on your browser or device. Your decision not to accept cookies could limit access to some of our Online Services and features. For example, we may not recognize your device and, if you are an online banking customer, you may need to answer challenge questions each time you log on.

Certain web browsers can transmit “Do Not Track” signals, but there is no universally accepted standard for how to interpret such signals. Our Online Services do not function differently in response to these web browser “Do Not Track” signals. However, you may opt out from certain targeted advertising as described above.



Manage how Capital One shares your financial information

For certain consumers of our financial products and services, our [U.S. Consumer Privacy Notice](#) governs how we share certain information with our affiliates and third parties, including for their direct marketing purposes, and will enable you to opt out of certain types of sharing.



Exercise other privacy rights or choices

You may have additional rights under applicable law, such as the California Consumer Privacy Act for California residents, or we may provide you with additional choices to access, delete, or otherwise manage certain personal information. For more information about these rights or choices and how to exercise them, please visit the [Manage Your Data](#) page or review our [California Consumer Privacy Act Disclosure](#) (for California residents), or [contact us](#).

Keeping Information Secure

At Capital One, we care about your safety and security. We have an information security program that includes administrative, technical, and physical measures to protect information within our company. While we strive to protect your information, no method of data transmission or storage is 100% secure, and we cannot ensure or warrant the security of your information.

- If you suspect a website or mobile app is pretending to be from Capital One (also known as “spoofing”), do not enter personal information. Instead, contact us in a branch or through a phone number you know is associated with your account at Capital One. You can also email us at abuse@capitalone.com.
- If you receive an email that claims to be from us, but you are not sure or think it is suspicious, do not click on any of the links in the email. Instead, forward it to us at abuse@capitalone.com and delete it.
- If you have reason to believe that your interaction with us is no longer secure, please immediately notify us at abuse@capitalone.com.

Visit our [Fraud and Identity Theft Prevention](#) page for more information about our commitment to security and tips about how to guard against fraud and identity theft.

Children's Privacy

Our Online Services are not directed to children under 13. We also do not knowingly collect personal information from children under 13 through our Online Services. We kindly request that children do not provide information to us through our Online Services.

Social Media

Capital One has official pages on social media services such as Facebook, Twitter, Pinterest, Tumblr, LinkedIn, and YouTube. When you interact with us on these pages or elsewhere on social media, we may collect information such as your likes, interests, feedback, and preferences. We may collect additional information from social media companies if you choose to share with them and they, in turn, share such information with us.

Any posts you make on our official social media pages -- including posts that contain pictures, comments, suggestions, opinions, complaints, or personal information -- are available to others who use those pages. Never include sensitive personal, financial, or other confidential information such as your Social Security number, account number, phone number, mailing address, or email address when posting or commenting online. Please refer to the privacy policies of our social media partners when you interact with them online.

Additional Resources

Updates to This Privacy Policy

We may change this Privacy Policy in the future. When we do, we will post the revised Privacy Policy on our website. This Privacy Policy was last updated and became effective on the date posted at the top of this page.

Contact Us

If you have questions about this Privacy Policy or our privacy practices, please visit capitalone.com/privacy, or contact us at [customer support](#).

Products

Get to Know Us

On the Go

Legal

Support

Footnotes

Learn more about FDIC insurance coverage.

[Privacy](#)

[Security](#)

[AdChoices](#)

[Terms & Conditions](#)

©2021 Capital One



EXHIBIT 58

GOOG-CABR-05877300

continued access or use of our Services after receiving the notice of changes, constitutes your acknowledgement that you accept the updated Policy.

In addition, we may provide you with real time disclosures or additional information about the Personal Information handling practices of specific parts of our Services. Such notices may supplement this Policy or provide you with additional choices about how we process your Personal Information.

Quick Links

Click on the links below to go to a specific section of this Privacy Policy.

- [Personal Information We Collect >](#)
- [Cookies and Other Tracking Technologies >](#)
- [How We Use Your Personal Information >](#)
- [Sharing Your Personal Information >](#)
- [Security Precautions >](#)
- [Your Rights >](#)
- [Retention >](#)
- [Third-Party Websites >](#)
- [Children >](#)
- [Specific Notice for Californian residents >](#)
- [Specific Notice for Individuals in the European Economic Area, the United Kingdom and Switzerland >](#)
- [Contact Us >](#)

GET EXTRA 10%

1. Personal Information We Collect

We collect personal information when you use our Services, create an account with us or submit personal information when requested with the Site. Personal information generally is any information that relates to you, identifies you personally or could be used to identify you, such as your name, email address, phone number, address and payment account number. The definition of personal information varies by jurisdiction. Only the definition that applies to you based on your location applies to you under this Privacy Policy. Personal

×



information does not include data that has been irreversibly anonymized or aggregated so that it can no longer enable us, whether in combination with other information or otherwise, to identify you.

The types of personal information that we may collect about you include:

- A. Information You Directly and Voluntarily Provide to Us to execute the purchase or services contract. We collect your personal information you give us when you use our Services. For example, if you visit our Site and place an order, we collect information that you provide to us during the ordering process. This information will include your first and last name, mailing address, email address, phone number, payment account or credit card information. In some regions, , passport information and tax number are also needed for customer clearance . We may also collect personal information when you communicate with any of our departments such as customer service, or when you complete online forms or surveys provided on the Site. You may also choose to provide your email address to us if you would like to receive information about the products and services that the SHEIN offers, such as SHEIN Style News.
- B. Information You Provide to us to improve our products and services. You may voluntarily provide us with your height, age, and weight and measurements and your preference. This information is used by us to recommend clothing sizes, and to provide fit prediction services for you.
- C. Information You Post on the Site. If you post information on public areas of the Site, for example a customer review, that information may be collected and used by SHEIN, users of the Site, and the public generally. We strongly recommend that you do not post any information through the Site that allows strangers to identify or locate you or that you otherwise do not want to share with the public.
- D. Information You Provide through our Live Chat on the Site. We will also store your voice information when you communicate with customer service via voice for related issues, and we will keep your voice information secure. You may provide personal information through our Live Chat which is available on the Site 24 hours a day. We strongly recommend that you do not post any information through the Live Chat that you are not comfortable sharing with a chat employee.

GET EXTRA 10%

×



E. Information You Provide to Participate in Sweepstakes. From time to time, we may ask you to complete a survey and/or offer you an opportunity to participate in promotions, programs (such as the SHEIN VIP program) and/or sweepstakes (collectively, "Promotions") via the Site or through a third-party platform. If you choose to participate in a Promotion, we will collect and store the personal information you provide in connection with your participation in the Promotion, including, but not limited to, your name, email address, date of birth, and/or phone number. Such information shall be subject to this Privacy Policy unless otherwise stated in the official rules or guidelines of the Promotion or in another privacy policy governing the Promotion.

Information we collect in connection with a Promotion will be used to administer the Promotion, such as by notifying winners and distributing prizes. As permitted by applicable law, your information may also be used by SHEIN or the Promotion sponsor for marketing purposes. Your entry into the Promotion may result in the addition of your information to our mailing list as well as to the mailing list of our promotional partners. Acceptance of a prize may require you (unless prohibited by law) to allow us to post publicly some of your information via the Site, such as on a winner's page.

F. Information Automatically Collected Through the Site. We may automatically collect personal information about you when you use the Site. For example, if you access the Site through a computer, we will automatically collect information such as your browser type and version, computer and connection information, Internet Protocol ("IP") address and standard web log information. If you access the Site through a mobile device, we may also be able to identify the location of your mobile device. You may choose not to share your location details with us by adjusting your mobile device's location services settings. For instructions on changing the relevant settings, please contact your service provider or device manufacturer. Please see section 2 below to learn more about our automatic Personal information processing activities.

G. Combination and automated information. We may also combine the information we collect among our services and across your devices and use different technologies to

GET EXTRA 10%

×



process your information for the purposes described above. For example, we use automated systems that analyze your account status and payment information to detect the unsafe and unsecured payment. We also use automated systems to assess security of your account and provide you suggestion to improve the security of your account.

2. Cookies and Other Tracking Technologies

We may use cookies, tags, and similar technologies to automatically collect information on our Services. These tracking technologies allow our technology partners to collect information including your computer's IP address, your mobile device identifier, the type of internet browser you are using, operating system, referral URLs, date/time stamps, pages viewed, and simple keyword tags. Cookies or tags are bits of code that allow our technology partners to collect information including your computer's IP address, your mobile device identifier, the type of internet browser you are using, operating system, referral URLs, date/time stamps, pages viewed, and simple keyword tags. We also use web pixels to analyze usage patterns on our Site.

- A. Cookies. The cookies are small web files that a site or its provider transfers to your device's hard drive through your web browser that enables the site's or provider's system to recognize your browser and remember certain information.
- Generally, we use first-party and third-party cookies for the following purposes: to make our Services function properly; to provide a secure browsing experience during your use of our Services; to collect passive information about your use of our Services; to measure how you interact with our marketing campaigns; to help us improve our Services; and to remember your preferences for your convenience.

We use the following types of cookies on our Services:

- *Strictly Necessary Cookies*. These cookies are essential because they enable you to use our Services. For example, strictly necessary cookies allow you to access secure areas on our Services. Without these cookies, some services cannot be provided. These cookies do not gather information about you for

GET EXTRA 10%

×



marketing purposes. This category of cookies is essential for our Services to work and they cannot be disabled.

- *Functional Cookies.* We use functional cookies to remember your choices so we can tailor our Services to provide you with enhanced features and personalized content. For example, these cookies can be used to remember your name or preferences on our Services. We do not use functional cookies to target you with online marketing. While these cookies can be disabled, this may result in less functionality during your use of our Services.
- *Performance or Analytic Cookies.* These cookies collect passive information about how you use our Services, including webpages you visit and links you click. We use the information collected by such cookies to improve and optimize our Services. We do not use these cookies to target you with online marketing. You can disable these cookies.
- *Advertising or Targeting Cookies.* These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting advertisements that are based on your interests. Our third-party advertising partners may use these cookies to build a profile of your interests and deliver relevant advertising on other sites. You may disable the use of these cookies as set forth below.

B. Other Tracking Technologies. To see how successfully our marketing campaigns or other Site goals are performing we sometimes use conversion pixels, which fire a short line of code to tell us when you have clicked on a particular button or reached a particular page (e.g. a thank you page once you have completed the procedure for subscribing to one of our services or have completed one of our forms). We also use web pixels to analyze usage patterns on our Site. The use of a pixel allows SHEIN to record that a particular device, browser, or application has visited a particular webpage.

C. Your Choices. Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can

GET EXTRA 10%

x



exercise your preferences in relation to cookies served on our Sites by taking the steps outlined below.

- *First-Party Cookies.* You can use the browser with which you are viewing this Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Services may not work properly. You can find more information about how to change your browser cookie settings at <http://www.allaboutcookies.org>.
- *Mobile Advertising:* If you are not located in the European Countries, you can opt out of having your mobile advertising identifiers used for certain types of advertising by accessing the settings in mobile device and following the instructions. If you opt-out, we will remove all data about you and will not collect any further data. The random ID previously assigned to you will be removed. Thus, if at a later stage, you decide to opt-in, we will be unable to continue to track you using the prior ID and you will for all practical purposes be a new user. If you are located in the European Countries, the cookie banner on our website will provide you the opportunity to consent to having your mobile advertising identifiers used for certain types of advertising by accessing the settings in mobile device.
- *Third-Party Cookies.* If you are not located in the European Countries, to opt-out of third-party advertising networks and similar entities that use advertising cookies go to <http://www.aboutads.info/choices>. Once you click the link you may choose to opt-out of such advertising from all participating advertising companies or only advertising provided by specific advertising entities. For more information about third-party advertising networks and similar entities that use these technologies, please see <http://www.aboutads.info/consumers>. If you are not located in the European Countries, the cookie banner on our

GET EXTRA 10%

×



website will provide you the opportunity to consent to having third-party advertising cookies.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. In addition, most web browsers provide help pages relating to setting cookie preferences. More information may be found for the following browsers here:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)
- [Opera Mobile](#)

D. *Analytics.* If you are not located in the European Countries, we may use third-party service providers to monitor and analyze the use of our Site. Presently, we use Google Analytics. Google Analytics is a web analytics service offered by Google LLC ("Google") that tracks and reports Site traffic. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout>. If you are located in the European Countries, and the Google Analytics is structured to collect Personal Information, the cookie banner on our website will provide you the opportunity to consent to Google Analytics.

E. *Behavioral Remarketing.* We also use remarketing services to advertise on third-party websites to you after you visited our Site or services. If you are not located in the European Countries, we and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service. We use Google Ads for these purposes. Google Ads remarketing service is provided by Google. You can

GET EXTRA 10%

x



opt-out of this by visiting the Google Ads Settings page:

<http://www.google.com/settings/ads>. If you are located in the European Countries, and the Google Ads is structured to collect Personal Information, the cookie banner on our website will provide you the opportunity to consent to Google Ads.

- F. Other Tracking Technologies. We may also use Tracking Technologies to collect "clickstream" data, such as the domain name of the service providing you with Internet access, your device type, IP address used to connect your computer to the Internet, your browser type and version, operating system and platform, the average time spent on our Site, webpages viewed, content searched for, access times and other relevant statistics, and assign unique identifiers to the device or other credentials you use to access the Site for the same purposes.

Pages of our Site and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Pages of our Site may also use Java scripts, which are code snippets embedded in various parts of websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components; entity tags, which are HTTP code mechanisms that allow portions of websites to be stored or "cached" within your browser to accelerate website performance; and HTML5 local storage, which allows data from websites to be stored or "cached" within your browser to store and retrieve data in HTML5 pages when the website is revisited.

- G. Do Not Track. Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit "Do Not Track" or "DNT" signals. Since uniform standards for "DNT" signals have not been adopted, our Site does not currently process or respond to "DNT" signals.

- H. Location Information. You may be able to adjust the settings of your device so that information about your physical location is not sent to us or third-parties by (a)

GET EXTRA 10%

×



disabling location services within the device settings; or (b) denying certain websites or mobile applications permission to access location information by changing the relevant preferences and permissions in your mobile device or browser settings.

Please note that your location may be derived from your WiFi, Bluetooth, and other device settings. See your device settings for more information.

3. How We Use Your Personal Information

We will only use your personal information as described in this Privacy Policy or as disclosed to you prior to such processing taking place.

- A. To Provide You Our Services. We will use your personal information to provide information or perform Services that you request, including managing your request as a registered user of our Site. If the applicable information is to be provided or Service is to be performed by a third party, then we will disclose the applicable information to the third party providing the information or performing applicable Services. All third parties that we work with are contractually obligated to protect your information as disclosed in this Privacy Policy.
- B. For Internal Use. We use your personal information for the purposes of furthering our business, including improving our Site's content and functionality by analyzing where, on which types of devices and how our Site is used, how many visitors we receive, and where they click through to the Site from. We also use it to remember you in case you re-visit our Site, so we will know if you have already been served with surveys, or (where Site content is undergoing testing) which version of the content you were served.
- C. To Provide You with Service-Related Communications. We will send you administrative or account-related information to keep you updated about your account and the Services. Such communications may include information about Privacy Policy updates, confirmations of your account actions or transactions, security updates or tips or other relevant transaction-related information. We process your contact information to send you such communications. Service-related

GET EXTRA 10%

×



communications are not promotional in nature. You are not able to unsubscribe from such communications, otherwise you may miss important developments relating to your account or the Services.

D. To Provide Customer Support or Respond to You. We collect any information that you provide to us when you contact us. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services.

E. To Ensure the Security of the Services. We care about keeping you secure and safe while using our Services. Keeping you safe requires us to process your personal information, such as your device information, activity information and other relevant information. We use such information to combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not gain access to your information. We cannot ensure the security of our Services if we do not process your personal information for security purposes.

F. To Enforce Compliance with Our Terms and Agreements or Policies. When you access or use our Services, you are bound to our Terms and Conditions. To ensure you comply with them, we process your personal information by actively monitoring, investigating, preventing and mitigating any alleged or actual prohibited, illicit or illegal activities on our Services. Subject to the applicable law, we may also process your personal information to: investigate, prevent or mitigate violations of our internal terms, agreements or policies and enforce our agreements with third parties and business partners.

G. To Maintain Legal and Regulatory Compliance. Our Services are subject to certain laws and regulations which may require us to process your personal information. For example, we process your personal information to pay our taxes, to fulfill our business obligations, ensure compliance with employment and recruitment laws or as necessary to manage risk as required under applicable law. Without processing your personal information for such purposes, we cannot perform the Services in accordance with our legal and regulatory requirements.

GET EXTRA 10%

×



4. Sharing Your Personal Information

Other than sharing your personal information so that you can use our Services, or as required or permitted by law, we do not share personal information about you with non-affiliated third parties. We may disclose your personal information as described below.

A. Within Our Corporate Organization. SHEIN is a part of a corporate organization that has several legal entities, business processes, management structures and technical systems. SHEIN may share your personal information within this organization to provide you with the Services and take actions based on your request.

For example, we may share your personal information within our organization to facilitate payment processing. For European Economic Area customers, payment collection is operated by our UK subsidiary ZENITH BUSINESS CO., LIMITED (ZENITH), Address: Unit 3, Lake Farm House Allington Lane, Fair Oak, Eastleigh, Hampshire, United Kingdom, SO50 7DD. ZENITH will be in charge of all the relevant issues relating to the payment of EU customer such as refund, cancellations, returns, and purchase disputes, as well as customer support etc.

For United States customers, payment collection is operated by Fashion Direct Corp., a U.S. corporation, located at 1000 N West Street, Suite 1200, office 1271, Wilmington, DE 19801.

B. Third Parties. We may share your personal information with third-party service providers acting on our behalf to help us operate our Services. Service providers and vendors provide us with support services such as credit card processing, website hosting, email and postal delivery, analytics services, conducting surveys and research, and performing network maintenance. These third parties can only use your data in accordance with our written instructions and must comply with the information security protections we have put in place.

C. To Maintain Legal and Regulatory Compliance. We have the right to disclose your personal information as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on SHEIN. If there is a

GET EXTRA 10%

×



takeover, sale or purchase of our business, we may disclose your personal information to the new (or prospective) owner of the business.

- D. Third Party Advertisers. In certain circumstances, and subject to the applicable law, we may share your personal information with third parties to market their products or services to you.
- E. Co-Branded Services and Features. Portions of our Site or Services may be offered as part of co-branded services and features. We will share your personal information with our co-branded partners based on your voluntary use of or participation in a co-branded service or feature. The co-branded partners will be identified on the co-branded feature or service, along with an applicable co-branded partner's privacy policy. Use of your personal information by a co-branded partner will be subject to a co-branded partner's privacy policy. If you wish to opt-out of a co-branded partner's future use of your personal information, you will need to contact the co-branded partner directly.
- F. Consent. We may disclose your personal information for any purpose with your consent.

5. Security Precautions

We maintain physical, electronic, and procedural safeguards designed to guard and prevent misuse of your personal information. Our security measures include industry-standard physical, technical and administrative measures to prevent unauthorized access to or disclosure of your information, to maintain data accuracy, to ensure the appropriate use of information, and otherwise safeguard your personal information. We restrict access to your non-public personal information to those employees and third parties who need such information to provide products or Services.

Please recognize that protecting your personal information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers and other authentication information you use to access our Services.

If you feel that the security of your account or personal data has been compromised, please immediately contact us at following email address [Privacy Center](#). Please be aware that,

GET EXTRA 10%

×



despite our best efforts, no security system is impenetrable. In the event of a security breach, we will promptly notify you and the proper authorities if required by law.

6. Your Rights

We take reasonable steps to ensure that your personal information is accurate, complete, and up to date. You have the right to access, correct, or delete the personal information that we collect, subject to certain exceptions. To protect the privacy and the security of your personal information, we may request data from you to enable us to confirm your identity and right to access such data, as well as to search for and provide you with the personal data we maintain. There are instances where applicable laws or regulatory requirements allow or require us to refuse to provide or delete some or all of the personal information that we maintain. You may [Contact Us](#) to exercise your rights.

7. Retention

We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

If you send us correspondence, including emails, we retain such information electronically in the records of your account. We will also electronically retain customer service correspondence and other correspondence from SHEIN to you. We retain these records to measure and improve our customer service and to investigate potential fraud and violations. We may, over time, delete these records as permitted by law.

SHEIN will also retain Site and services usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Site, or we are legally obligated to retain this data for longer periods.

GET EXTRA 10%

×



8. Third-Party Websites

Our Site may contain links to third-party sites. This Privacy Policy does not apply to those third-party sites. We recommend that you read the privacy statements of any other sites that you visit as we are not responsible for the privacy practices of those sites.

9. Children

Our Services are not directed to, and we do not knowingly collect personal information from, children under the age of 16. If you are under 16, please do not attempt to fill out our forms or send any personal information about yourself to us. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information from our files.

10. Notice for California Residents

This section applies only to California residents. Pursuant to the California Consumer Privacy Act of 2018, as amended ("CCPA"), below is a summary for the last twelve (12) months of the personal information categories, as identified and defined by the CCPA (see California Civil Code section 1798.140 (o)), that we collect, the reason we collect the personal information, where we obtain the personal information, and the third parties that we may share the personal information.

We generally collect the following categories of personal information when you use our Services:

- identifiers such as a name, address, unique personal identifier, email, phone number, your device's IP address, software, and identification numbers associated with your devices;
- commercial information such as records of products or services purchased, obtained, or considered by you;
- Internet or other electronic information regarding you browsing history, search history, the webpage visited before you came to our Site, length of visit and number

GET EXTRA 10%

×



of page views, click-stream data, locale preferences, your mobile carrier, date and time stamps associated with transactions, and system configuration information;

- your geolocation, to the extent you have configured your device to permit us to collect such information;
- audio recordings of your voice to the extent you call us, as permitted under applicable law; and
- inferences about your preferences, characteristics, behavior and attitudes.

We generally do not collect protected classifications about our users, biometric information, professional or employment-related information, or education-related information. For more information about the personal information we collect and how we collect it, please refer to sections 1 and 2 above.

We collect your personal information for the business purposes described in section 3. The CCPA defines a “business purpose” as the use of personal information for the business’s operational purposes, or other notified purposes, provided the use of personal information is reasonably necessary and proportionate to achieve the operational purpose for which the personal information was collected or another operational purpose that is compatible with the context in which the personal information was collected.

The categories of third parties with whom we may share your personal information are listed above in section 4, above.

If you are a California resident, you have rights in relation to your personal information; however, your rights are subject to certain exceptions. For instance, SHEIN cannot disclose specific pieces of personal information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the personal information, your account with us or the security of our network systems. To assert your right to know or your right to delete your personal information, please contact us by email at [Privacy Center](#). To confirm your identity, we may ask you to verify personal information we already have on file for you. If we cannot verify your identity based on the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.

- *Right Against Discrimination*. You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your right to know, delete or opt-out of sales.

GET EXTRA 10%



- *Right to Know.* You have the right to request in writing: (i) a list of the categories of personal information, such as name, address, email address, that a business has disclosed to third parties during the immediately preceding calendar year for the third parties' direct marketing purposes, and (ii) the names and addresses of all such third parties. In addition, you have the right to request: (i) the categories of personal information we have collected about you, (ii) the categories of sources from which personal information is collected, (iii) the business or commercial purpose for the information collection, (iv) the categories of third parties with whom we have shared personal information, and (v) the specific pieces of personal information we hold about an individual. You have the right to request a copy of the specific personal information we collected about you during the 12 months before your request.
- *Right to Delete.* You have the right to request us delete any personal information we have collected from you or maintain about you, subject to certain exceptions.
- *Right to Opt-Out of Selling.* You have the right to opt-out of having your personal information sold. We do not sell your personal information. The CCPA broadly defines "personal information" and "selling" such that sharing identifiers linked to you for a benefit may be considered a sale. In 2019, we were sharing identifiers and inferences about you with our partners, third parties and affiliates in such a way that, under the CCPA, may be defined as selling. As noted above, you have the right to know the categories of personal information that we sold about you and the categories of third parties with whom we shared such information.

In addition, California Civil Code Section 1798.83 permits customers of SHEIN who are California residents to request certain information regarding our disclosure of personal information to third-parties for their direct marketing purposes. In your request, please specify that you want a "California Shine the Light Notice." Please allow 30 days for a response. To make the request, please click ["Do Not Sell My Personal Information"](#).

GET EXTRA 10%

×

11. Notice to Individuals in the European Economic Area, the United Kingdom and Switzerland



This section only applies to individuals using or accessing our Service while located in the European Economic Area, the United Kingdom, or Switzerland (collectively, the “European Countries”) at the time of data collection. Pursuant to the EU’s General Data Protection Regulation (GDPR), personal information is referred to as personal data. For the sake of clarity references to personal information in this Policy concerns personal data in the sense of the GDPR.

We may ask you to identify which country you are located in when you use or access some of the Services, or we may rely on your IP address to identify which country you are located in. When we rely on your IP address, we cannot apply the terms of this section to any individual that masks or otherwise hides their location information from us so as not to appear located in European Countries. If any terms in this section conflict with other terms contained in this Policy, the terms in this section shall apply to individuals in a European Country.

Our Relationship to You. Your personal information is collected and processed by ZOETOP Business Co., Limited, Incorporated in HongKong, which is operating the website and the sale of SHEIN brand products. In other words, ZOETOP Business Co., Limited is the Controller of the data. This means that we are responsible for processing and protecting your personal data.

Legal Bases for Processing Your Personal Information. We rely on the following legal bases under the GDPR in processing your personal information.

Our legal basis to process personal information for the following sections of this Privacy Policy is your consent.

- Section 2 In relation to mobile Advertising and third-party advertising and analytics cookies, that collect your personal information, as described in that Section.
- Section 4(D) Third Party Advertisers
- Section 4(F) Consent

Our legal basis to process personal information for the following sections of this Privacy Policy is to provide our Services to you. Our processing is based on our contract obligations or to take steps at the request of the individual prior to entering into a contract.

- Section 3(A) To Provide You Our Services
- Section 3(C) To Provide You with Service-Related Communications
- Section 3(D) To Provide Customer Support or Respond to You

GET EXTRA 10%

x



- Section 4(A) Within Our Corporate Organization
- Section 4(B) Third Parties
- Section 4(E) Co-Branded Services or Features

Our legal basis to process personal information for the following sections of this Privacy Policy is our legitimate interest to better understand you, to maintain and improve the accuracy of the information we store about you, and to better promote or optimize our Services.

- Section 3(B) For Internal Use

Our legal basis to process personal information for the following sections of this Privacy Policy is to comply with our legal obligations, or your vital interest.

- Section 3(E) To Ensure the Security of the Services
- Section 3(F) To Enforce Compliance with Our Terms and Agreements or Policies
- Section 3(G) To Maintain Legal and Regulatory Compliance
- Section 4(C) To Maintain Legal and Regulatory Compliance

Marketing. We will only contact you if you are located in a European Country by electronic means (including email or SMS) based on our legitimate interests, as permitted by applicable law or your consent. If you do not want us to use your Personal Information in this way, please click the unsubscribe link at the bottom of any of our email messages to you or contact us at [Privacy Center](#). You can object to direct marketing at any time and free of charge.

Individual Rights. We provide you with the rights described below when you use our Services. We may limit your individual rights requests: (a) where denial of access is required or authorized by law; (b) when granting access would have a negative impact on other's privacy; (c) to protect our rights and properties; or (d) where the request is frivolous or unrealistic. If you would like to exercise your rights under applicable law, please contact us at [Privacy Center](#).

- You can request access or deletion of your personal information, subject to certain exceptions.
- You can correct or update your personal information, object to processing of your personal information, ask us to restrict processing your personal information or request portability of your personal information.

GET EXTRA 10%

×



- If we collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of the processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information.

If you believe we have infringed or violated your privacy rights, please contact us at [Privacy Center](#) so that we may resolve your dispute directly.

Transfer of Your Personal Information. When you access or use our Services, **your personal information may be processed or transferred outside the EEA, including to the United States, China and/or Singapore.** Such countries or jurisdictions may have data protection laws that are less protective than the laws of the jurisdiction in which you reside. For these transfers we rely on appropriate safeguards as permitted under the GDPR such as Standard Contractual Clauses, and/or we transfer the personal information pursuant to Article 49 (1) (b) GDPR to provide our Services pursuant to the Terms & Conditions. If you do not want your information transferred to, processed, or maintained outside of the country or jurisdiction where you are located, you should immediately stop accessing or using the Services. For further details about these transfers and the safeguards that we use to facilitate such transfers, contact us at [Privacy Center](#).

12. Contact Us

If you have questions or concerns regarding any information in this Privacy Policy, please contact us by [Privacy Center](#). You can also contact us via our [customer service Platform](#) at our Site.

GET EXTRA 10%

×



**COMPANY
INFO**

About SHEIN
Social
Responsibility
Affiliate
Fashion
Blogger

**HELP &
SUPPORT**

Shipping Info
Returns
How To Order
How To Track
Size Guide

**CUSTOMER
CARE**

Contact Us
Payment &
Tax
Bonus Point
Klarna
Afterpay

FIND US ON

SIGN UP FOR SHEIN STYLE NEWS

Your Email Address

**DOWNLOAD
SHEIN APP TO
SAVE MORE!**



SUBSCRIBE

WE ACCEPT

©2009-2021 SHEIN All Rights Reserved

[Privacy Center](#) | [Privacy & Cookie Policy](#) |

[Manage Cookies](#) | [Terms & Conditions](#) |

[Copyright Notice](#) | [Accessibility](#) | [United States](#)

APPLE

GET IT ON
Google Play

GET EXTRA 10%

×



EXHIBIT 59

Website Cookie Policy

Last Updated: August 31, 2020; Effective: September 1, 2020

This Cookie Policy describes the different types of cookies that may be applied on the equipment of consumers who visit granie3.com and any other websites (the “Sites”) owned and operated by Drudge Report, Inc. and its affiliates (collectively, “Drudge Report”).

We may update this Cookie Policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Policy regularly to stay informed about our use of cookies and similar technologies. The date at the top of this Cookie Policy indicates when it was last updated.

If you have any further queries, please contact us by email at drudge@drudgereport.com.

Some cookies that we use through the Sites will collect personal information about you, or information that becomes personal information if we combine it with other data. Any personal information that we collect will be used in accordance with our [Privacy Policy](#).

WHAT IS A COOKIE?

Cookies are a standard feature of websites that allow us to collect certain information from your browser or device when you visit our Sites. In relation to the use of cookies by our partners and clients, note that we do not have access or control over these cookies.

WHAT COOKIES DO WE USE?

We use a variety of cookies on the Drudge Report Sites for several reasons. We also may use web logs, pixel tags, or web beacons, which are pieces of code that may be used to read and place cookies on a web browser, to collect information about how you interact with websites or advertisements.

The sections below describe the types of cookies most frequently used by Drudge Report on the Sites and explain their use.

Essential Cookies

We use cookies that are essential to making the Sites work. These types of cookies enable you to move around the Sites and use their features. For example, we may use cookies to record a user login, manage user sessions, authenticate users of our management apps, or adjust settings and functionality on the Sites. Without these cookies, we may not be able to provide the services that are necessary for you to be able to use the Sites.

Cookie Names	Purpose
--------------	---------

__cfduid	This cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis. For example, if a visitor is in a coffee shop where there may be several infected machines, but the specific visitor's machine is trusted (for example, because they completed a challenge within your Challenge Passage period), the cookie allows our security system to identify that client and not challenge them again. It does not correspond to any user ID in our web application, and does not store any personally identifiable information.
in_ca	This indicates you are in California, as inferred from your IP address. California residents are shown an alternate version of the Drudge Report including all required notices.
optout	This indicates you exercised your right to opt out of "sale" of your information.

Preference Cookies

We also use cookies that collect information about your choices and preferences. These cookies may allow us to remember language or other local settings and customize the Sites accordingly. For example, we use a cookie to confirm consent to use cookies.

Cookie Names	Purpose
consent	This indicates you consented to our privacy policy so it will no longer show you the consent banner.

Analytics Cookies

These cookies collect information about how people are using the Sites, for example which pages are visited the most often, how visitors move from one webpage to another, and whether visitors experience any difficulty using the Sites. Overall, these cookies provide us with analytical information about how the Sites are performing and how we can improve it, and in some instances, whether our advertising is effective or not.

Cookie Names	Purpose
Google Analytics [ga.js]	We use Google Analytics cookies to collect aggregate statistical data about how visitors use the Sites so that we can improve the user experience and serve up the content our visitors find most useful. Google Analytics cookies store

information such as what pages users visit, how long they are on the Sites, how they arrived at the Sites, and what they click on.

To learn more about Google's practices and to opt out, please visit

<http://www.google.com/policies/privacy/partners/>,
<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>, and <https://tools.google.com/dlpage/gaoptout>.

The following cookies may be used in connection with Google Analytics:

[_utma] Used to distinguish users and sessions.

[_utmb] Used to determine new sessions/visits.

[_utmc] Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.

[_utmt] Used to throttle request rate (e.g., to reduce the frequency with which a browser may request data from the server).

[_utmz] Stores the traffic source or indicates the advertising campaign that explains how the user reached our Sites.

eproofui	This cookie is used to track the number of times you access the Drudge Report, at what times, and from where.
----------	---

Advertising Cookies

We may partner with certain third parties to deliver advertising that we believe may interest you based on your activity on our Sites and other websites over time. These third parties may set and access cookies on your computer or other device and may also use web logs, pixel tags, or web beacons. These cookies are used to deliver advertisements that are more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of the advertising campaign.

Cookie Names	Purpose
Advertising Partners [*]	These cookies are associated with one of our advertising partners. These are used for preference based advertising. To prevent sharing among these partners, California residents may opt-out .
Google	This is a cookie associated with Google Ads, a digital advertising service. To


Ads [_gads]	learn more about Google's practices and to opt out, please visit Ads Settings .
Quantcast [_qca]	This is a cookie associated with Quantcast, a digital advertising company. Quantcast provides website rankings, and the data the cookie collects is also used for audience segmentation and targeted advertising. To learn more about Quantcast's practices and to opt out, please visit https://www.quantcast.com/opt-out/ .

* A range of cookie names may be used occasionally, depending on your browsing activity. All cookies not explicitly named here are Advertising Cookies from Advertising Partners.

HOW DO I MANAGE COOKIES?


You have the right to decide whether to accept or reject cookies. In addition to the options provided above, you may refuse or accept cookies from the Sites at any time by activating settings on your browser. Information about the procedure to follow in order to enable or disable cookies can be found on your Internet browser provider's website via your help screen. You may wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html> for information on commonly used browsers. Please be aware that if cookies are disabled, some website features may not operate as intended. For example, you will be unable to dismiss our consent banner for repeated visits, and if you are a California resident, you may not be shown the California version of our web site.


EXHIBIT 60




Hello
Select your address

All



 Hello, Sign in
Account & Lists

Returns
& Orders

 Cart

All Best Sellers Amazon Basics New Releases Customer Service Today's Deals Prime Amazon Home Books Buy Black now and beyond

Help & Customer Service

All Help Topics

Legal Policies

3rd Party Licensing Notice
(Mobile App)

Conditions of Use

Amazon.com Privacy Notice


Amazon Group Companies


Non-Exhaustive List of Applicable
Amazon Patents and Applicable
Licensed Patents


Non-Exhaustive List of Amazon
Trademarks


Amazon.com Gift Card and
Electronic Message
Customization Service Terms


Quick solutions


 Your Orders
Track or cancel orders

 Returns & Refunds
Exchange or return items

 Manage Prime
Cancel or view benefits

 Payment Settings
Add or edit payment methods

 Carrier Info
Shipping carrier information

 Account Settings
Change email or password

Find more solutions

[Security and Privacy](#) > [Legal Policies](#) >

Amazon.com Privacy Notice

Last updated: February 12, 2021. To see prior version, click [here](#).

We know that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Notice describes how Amazon.com and its affiliates (collectively "Amazon") collect and process your personal information through Amazon websites, devices, products, services, online and physical stores, and applications that reference this Privacy Notice (together "Amazon Services"). **By using Amazon Services, you are consenting to the practices described in this Privacy Notice.**

- [What Personal Information About Customers Does Amazon Collect?](#)
- [For What Purposes Does Amazon Use Your Personal Information?](#)
- [What About Cookies and Other Identifiers?](#)
- [Does Amazon Share Your Personal Information?](#)
- [How Secure Is Information About Me?](#)
- [What About Advertising?](#)
- [What Information Can I Access?](#)
- [What Choices Do I Have?](#)
- [Are Children Allowed to Use Amazon Services?](#)
- [EU-US and Swiss-US Privacy Shield](#)
- [California Consumer Privacy Act](#)
- [Conditions of Use, Notices, and Revisions](#)
- [Related Practices and Information](#)
- [Examples of Information Collected](#)

What Personal Information About Customers Does Amazon Collect?

We collect your personal information in order to provide and continually improve our products and services.

Here are the types of personal information we collect:

- **Information You Give Us:** We receive and store any information you provide in relation to Amazon Services. Click [here](#) to see examples of what we collect. You can choose not to provide certain information, but then you might not be able to take advantage of many of our Amazon Services.
- **Automatic Information:** We automatically collect and store certain types of information about your use of Amazon Services, including information about your interaction with content and services available through Amazon Services. Like many websites, we use "cookies" and other unique identifiers, and we obtain certain types of information when your web browser or device accesses Amazon Services and other content served by or on behalf of Amazon on other websites. Click [here](#) to see examples of what we collect.
- **Information from Other Sources:** We might receive information about you from other sources, such as updated delivery and address information from our carriers, which we use to correct our records and deliver your next purchase more easily. Click [here](#) to see additional examples of the information we receive.

For What Purposes Does Amazon Use Your Personal Information?

We use your personal information to operate, provide, develop, and improve the products and services that we offer our customers. These purposes include:

- **Purchase and delivery of products and services.** We use your personal information to take and handle orders, deliver products and services, process payments, and communicate with you about orders, products and services, and promotional offers.
- **Provide, troubleshoot, and improve Amazon Services.** We use your personal information to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of the Amazon Services.
- **Recommendations and personalization.** We use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with Amazon Services.
- **Provide voice, image and camera services.** When you use our voice, image and camera services, we use your voice input, images, videos, and other personal information to respond to your requests, provide the requested service to you, and improve our services. For more information about Alexa voice services, click [here](#).
- **Comply with legal obligations.** In certain cases, we collect and use your personal information to comply with laws. For instance, we collect from sellers information regarding place of establishment and bank account information for identity verification and other purposes.
- **Communicate with you.** We use your personal information to communicate with you in relation to Amazon Services via different channels (e.g., by phone, email, chat).
- **Advertising.** We use your personal information to display interest-based ads for features, products, and services that might be of interest to you. We do not use information that personally identifies you to display interest-based ads. To learn more, please read our [Interest-Based Ads](#) notice.
- **Fraud Prevention and Credit Risks.** We use personal information to prevent and detect fraud and abuse in order to protect the security of our customers, Amazon, and others. We may also use scoring methods to assess and manage credit risks.

What About Cookies and Other Identifiers?

To enable our systems to recognize your browser or device and to provide and improve Amazon Services, we use cookies and other identifiers. For more information about cookies and how we use them, please read our [Cookies Notice](#).

Does Amazon Share Your Personal Information?

Information about our customers is an important part of our business, and we are not in the business of selling our customers' personal information to others. We share customers' personal information only as described below and with subsidiaries Amazon.com, Inc. controls that either are subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice.

- **Transactions involving Third Parties:** We make available to you services, products, applications, or skills provided by third parties for use on or through Amazon Services. For example, you can order products from third parties through our stores, download applications from third-party application providers from our App Store, and enable third-party skills through our Alexa services. We also offer services or sell product lines jointly with third-party businesses, such as co-branded credit cards. You can tell when a third party is involved in your transactions, and we share customers' personal information related to those transactions with that third party.
- **Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders for products or services, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), processing payments, transmitting content, scoring, assessing and managing credit risk, and providing customer service. These third-party service providers have access to personal information needed to perform their functions, but may not use it for other purposes.
- **Business Transfers:** As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that Amazon.com, Inc. or substantially all of its assets are acquired, customer

information will of course be one of the transferred assets.

- **Protection of Amazon and Others:** We release account and other personal information when we believe release is appropriate to comply with the law; enforce or apply our [Conditions of Use](#) and other agreements; or protect the rights, property, or safety of Amazon, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Other than as set out above, you will receive notice when personal information about you might be shared with third parties, and you will have an opportunity to choose not to share the information.

How Secure Is Information About Me?

We design our systems with your security and privacy in mind.

- We work to protect the security of your personal information during transmission by using encryption protocols and software.
- We follow the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data.
- We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of customer personal information. Our security procedures mean that we may ask to verify your identity before we disclose personal information to you.
- Our devices offer security features to protect them against unauthorized access and loss of data. You can control these features and configure them based on your needs. Click [here](#) for more information on how to manage the security settings of your device.
- It is important for you to protect against unauthorized access to your password and to your computers, devices, and applications. We recommend using a unique password for your Amazon account that is not used for other online accounts. Be sure to sign off when finished using a shared computer. Click [here](#) for more information on how to sign off.

What About Advertising?

- **Third-Party Advertisers and Links to Other Websites:** Amazon Services may include third-party advertising and links to other websites and apps. Third-party advertising partners may collect information about you when you interact with their content, advertising, and services. For more information about third-party advertising at Amazon, including interest-based ads, please read our [Interest-Based Ads](#) notice. To adjust your advertising preferences, please go to the [Advertising Preferences](#) page.
- **Use of Third-Party Advertising Services:** We provide ad companies with information that allows them to serve you with more useful and relevant Amazon ads and to measure their effectiveness. We never share your name or other information that directly identifies you when we do this. Instead, we use an advertising identifier like a cookie or other device identifier. For example, if you have already downloaded one of our apps, we will share your advertising identifier and data about that event so that you will not be served an ad to download the app again. Some ad companies also use this information to serve you relevant ads from other advertisers. You can learn more about how to opt-out of interest-based advertising by going to the [Advertising Preferences](#) page.

What Information Can I Access?

You can access your information, including your name, address, payment options, profile information, Prime membership, household settings, and purchase history in the "Your Account" section of the website. Click [here](#) for a list of examples that you can access.

What Choices Do I Have?

If you have any questions as to how we collect and use your personal information, please contact our [Customer Service](#). Many of our Amazon Services also include settings that provide you with options as to how your information is being used.

- As described above, you can choose not to provide certain information, but then you might not be able to take advantage of many of the Amazon Services.
- You can add or update certain information on pages such as those referenced in [What Information Can I Access?](#). When you update information, we usually keep a copy of the prior version for our records.
- If you do not want to receive email or other communications from us, please adjust your [Customer Communication Preferences](#). If you don't want to receive in-app notifications from us, please adjust your notification settings in the app or device.
- If you do not want to see interest-based ads, please adjust your [Advertising Preferences](#).

- The Help feature on most browsers and devices will tell you how to prevent your browser or device from accepting new cookies or other identifiers, how to have the browser notify you when you receive a new cookie, or how to block cookies altogether. Because cookies and identifiers allow you to take advantage of some essential features of Amazon Services, we recommend that you leave them turned on. For instance, if you block or otherwise reject our cookies, you will not be able to add items to your Shopping Cart, proceed to Checkout, or use any Services that require you to Sign in. For more information about cookies and other identifiers, see our [Cookies Notice](#).
- If you want to browse our websites without linking the browsing history to your account, you may do so by logging out of your account [here](#) and blocking cookies on your browser.
- You can manage the recommendations you receive in our store [here](#), remove recommendations you don't want to see [here](#) by selecting View All and Manage then selecting the Remove Items toggle that appears at the top of the page, and edit your browsing history [here](#).
- You will also be able to opt out of certain other types of data usage by updating your settings on the applicable Amazon website (e.g., in "Manage Your Content and Devices"), device, or application. For more information click [here](#). Most non-Amazon devices also provide users with the ability to change device permissions (e.g., disable/access location services, contacts). For most devices, these controls are located in the device's settings menu. If you have questions about how to change your device permissions on devices manufactured by third parties, we recommend you contact your mobile service carrier or your device manufacturer.
- If you are a seller, you can add or update certain information in [Seller Central](#), update your account information by accessing your [Seller Account Information](#), and adjust your email or other communications you receive from us by updating your [Notification Preferences](#).
- If you are an author, you can add or update the information you have provided in the [Author Portal](#) and [Author Central](#) by accessing your accounts in the Author Portal and Author Central, respectively.

In addition, to the extent required by applicable law, you may have the right to request access to or delete your personal information. If you wish to do any of these things, please contact [Customer Service](#). Depending on your data choices, certain services may be limited or unavailable.

Are Children Allowed to Use Amazon Services?

Amazon does not sell products for purchase by children. We sell children's products for purchase by adults. If you are under 18, you may use Amazon Services only with the involvement of a parent or guardian. We do not knowingly collect personal information from children under the age of 13 without the consent of the child's parent or guardian. For more information, please see our [Children's Privacy Disclosure](#).

EU-US and Swiss-US Privacy Shield

Amazon.com, Inc. participates in the EU-US and Swiss-US Privacy Shield frameworks. Click [here](#) to learn more.

California Consumer Privacy Act

Click [here](#) to read additional disclosures required under the California Consumer Privacy Act.

Conditions of Use, Notices, and Revisions

If you choose to use Amazon Services, your use and any dispute over privacy is subject to this Notice and our [Conditions of Use](#), including limitations on damages, resolution of disputes, and application of the law of the state of Washington. If you have any concern about privacy at Amazon, please contact us with a thorough description, and we will try to resolve it. Our business changes constantly, and our Privacy Notice will change also. You should check our websites frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

Related Practices and Information

- [Conditions of Use](#)
- [Seller Program Policies](#)
- [Help Department](#)
- [Most Recent Purchases](#)
- [Your Profile and Community Guidelines](#)

Examples of Information Collected

Information You Give Us When You Use Amazon Services

You provide information to us when you:

- search or shop for products or services in our stores;
- add or remove an item from your cart, or place an order through or use Amazon Services;
- download, stream, view, or use content on a device or through a service or application on a device;
- provide information in [Your Account](#) (and you might have more than one if you have used more than one email address or mobile number when shopping with us) or [Your Profile](#) ;
- talk to or otherwise interact with our Alexa Voice service;
- upload your contacts;
- configure your settings on, provide data access permissions for, or interact with an Amazon device or service;
- provide information in your [Seller Account](#) , [Kindle Direct Publishing](#) account , [Developer](#) account , or any other account we make available that allows you to develop or offer software, goods, or services to Amazon customers;
- offer your products or services on or through Amazon Services;
- communicate with us by phone, email, or otherwise;
- complete a questionnaire, a support ticket, or a contest entry form;
- upload or stream images, videos or other files to Prime Photos, Amazon Drive, or other Amazon Services;
- use our services such as Prime Video;
- compile Playlists, Watchlists, [Wish Lists](#) or other gift registries;
- participate in Discussion Boards or other community features;
- provide and rate [Reviews](#);
- specify a Special Occasion Reminder; or
- employ [Product Availability Alerts](#) , such as Available to Order Notifications.

As a result of those actions, you might supply us with such information as:

- identifying information such as your name, address, and phone numbers;
- payment information;
- your age;
- your location information;
- your IP address;
- people, addresses and phone numbers listed in your Addresses;
- email addresses of your friends and other people;
- content of reviews and emails to us;
- personal description and photograph in [Your Profile](#);
- voice recordings when you speak to Alexa;
- images and videos collected or stored in connection with Amazon Services;
- information and documents regarding identity, including Social Security and driver's license numbers;
- corporate and financial information;
- credit history information; and
- device log files and configurations, including Wi-Fi credentials, if you choose to automatically synchronize them with your other Amazon devices.

Automatic Information

Examples of the information we collect and analyze include:

- the internet protocol (IP) address used to connect your computer to the internet;
- login, email address, and password;
- the location of your device or computer;
- content interaction information, such as content downloads, streams, and playback details, including duration and number of simultaneous streams and downloads, and network details for streaming and download quality, including information about your internet service provider;
- device metrics such as when a device is in use, application usage, connectivity data, and any errors or event failures;
- Amazon Services metrics (e.g., the occurrences of technical errors, your interactions with

- service features and content, your settings preferences and backup information, location of your device running an application, information about uploaded images and files such as the file name, dates, times and location of your images);
- version and time zone settings;
 - purchase and content use history, which we sometimes aggregate with similar information from other customers to create features like [Top Sellers](#);
 - the full Uniform Resource Locator (URL) clickstream to, through, and from our websites, including date and time; products and content you viewed or searched for; page response times, download errors, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs);
 - phone numbers used to call our customer service number; and
 - images or videos when you shop in our stores, or stores using Amazon Services.

We may also use device identifiers, cookies, and other technologies on devices, applications, and our web pages to collect browsing, usage, or other technical information.

Information from Other Sources

Examples of information we receive from other sources include:

- updated delivery and address information from our carriers or other third parties, which we use to correct our records and deliver your next purchase or communication more easily;
- account information, purchase or redemption information, and page-view information from some merchants with which we operate co-branded businesses or for which we provide technical, fulfillment, advertising, or other services;
- information about your interactions with products and services offered by our subsidiaries;
- search results and links, including paid listings (such as Sponsored Links);
- information about internet-connected devices and services linked with Alexa; and
- credit history information from credit bureaus, which we use to help prevent and detect fraud and to offer certain credit or financial services to some customers.

Information You Can Access

Examples of information you can access through Amazon Services include:

- status of recent orders (including subscriptions);
- your complete order history;
- personally identifiable information (including name, email, password, and address book);
- payment settings (including payment card information, promotional certificate and gift card balances, and 1-Click settings);
- email notification settings (including Product Availability Alerts, Delivers, Special Occasion Reminders and newsletters);
- recommendations and the products you recently viewed that are the basis for recommendations (including Recommended for You and Improve Your Recommendations);
- shopping lists and gift registries (including Wish Lists and Baby and Wedding Registries);
- your content, devices, services, and related settings, and communications and personalized advertising preferences;
- content that you recently viewed;
- voice recordings associated with your account;
- Your Profile (including your product Reviews, Recommendations, Reminders and personal profile);
- If you are a seller, you can access your account and other information, and adjust your communications preferences, by updating your account in [Seller Central](#) .
- If you are an author, you can access your account and other information, and update your accounts, on the [Kindle Direct Publishing \(KDP\)](#) or [Author Central](#) website, as applicable.
- If you are a developer participating in our Developer Services Program, you can access your account and other information, and adjust your communications preferences, by updating your accounts in the [Developer Services Portal](#) .

Was this information helpful?

Yes

No

Back to top

Get to Know Us

Careers

Blog

About Amazon

Sustainability

Press Center

Investor Relations

Amazon Devices

Amazon Science

Make Money with Us

Sell products on Amazon

Sell apps on Amazon

Become an Affiliate

Become a Delivery Driver

Start a package delivery business

Advertise Your Products

Self-Publish with Us

Host an Amazon Hub

› See More Ways to Make Money

Amazon Payment Products

Amazon Rewards Visa Signature Cards

Amazon.com Store Card

Amazon Secured Card

Amazon Business Card

Amazon Business Line of Credit

Shop with Points

Credit Card Marketplace

Reload Your Balance

Amazon Currency Converter

Let Us Help You

Amazon and COVID-19

Your Account

Your Orders

Shipping Rates & Policies


Amazon Prime

Returns & Replacements

Manage Your Content and Devices

Amazon Assistant

Help



English

United States

Amazon Music

Stream millions of songs

Amazon Advertising

Find, attract, and engage customers

Amazon Drive

Cloud storage from Amazon

6pm

Score deals on fashion brands

AbeBooks

Books, art & collectibles

ACX

Audiobook Publishing Made Easy

Alexa

Actionable Analytics for the Web

Sell on Amazon

Start a Selling Account

Amazon Business

Everything For Your Business

Amazon Fresh

Groceries & More Right To Your Door

AmazonGlobal

Ship Orders Internationally

Home Services

Experienced Pros Happiness Guarantee

Amazon Ignite

Sell your original Digital Educational Resources

Amazon Web Services

Scalable Cloud Computing Services

Audible

Listen to Books & Original Audio Performances

Book Depository

Books With Free Delivery Worldwide

Box Office Mojo

Find Movie Box Office Data

ComiXology

Thousands of Digital Comics

DPReview

Digital Photography

Fabric

Sewing, Quilting & Knitting

Goodreads

Book reviews & recommendations

IMDb

Movies, TV & Celebrities

IMDbPro

Get Info Entertainment Professionals Need

Kindle Direct Publishing

Indie Digital & Print Publishing Made Easy

Amazon Photos

Unlimited Photo Storage Free With Prime

Prime Video Direct

Video Distribution Made Easy

Shopbop

Designer Fashion Brands

Amazon Warehouse

Great Deals on Quality Used Products

Whole Foods Market

America's Healthiest Grocery Store

Woot!

Deals and Shenanigans

Zappos

Shoes & Clothing

Ring

Smart Home Security Systems

eero WiFi

Stream 4K Video in Every Room

Blink

Smart Security for Every Home

Neighbors App

Real-Time Crime & Safety Alerts

Amazon Subscription Boxes

Top subscription boxes – right to your door

PillPack

Pharmacy Simplified

Amazon Renewed

Like-new products you can trust

Conditions of Use

Privacy Notice

Interest-Based Ads

© 1996-2022, Amazon.com, Inc. or its affiliates

EXHIBIT 61

We use cookies and similar technologies to give you a personalised shopping experience, personalised advertising and to analyse our web traffic.

What are cookies?

Cookies are data files which can hold small amounts of info and they are stored on your device (computer, smartphone, etc) when you first visit a website. We use cookies when you visit our site, but you can choose to not allow some types of cookies. But don't forget, blocking some cookies may impact your experience of the site and the services we are able to offer.

How do we use them?

We use cookies for:

- essential operations, like site navigation
- allowing you to add items to your shopping bag or to your Saved Items
- analysing visitor numbers and behaviours, such as what pages are frequently visited
- assessing the success of our advertising campaigns, offers and communications
- targeting suitable advertising messages
- understanding which Affiliates have helped us reach out to new customers, or have promoted our products on their websites

For full information on how we use your data, head to our [Privacy Policy](#).

What types of cookies do we use?

How to manage cookies



**Hey! Do you want to deliver to
United States?**

DELIVER TO UNITED STATES

OR

DELIVER ELSEWHERE



**Hey! Do you want to deliver to
United States?**

DELIVER TO UNITED STATES

OR

DELIVER ELSEWHERE

EXHIBIT 62

Privacy & Cookies: Our promises

We'll always keep your data safe and secure. So you're clued up, here's why we need it and how we use it.

Our Privacy Promise

[WATCH VIDEO](#)

1. The good stuff

We will only use your data to up your experience.

2. Locked down

We'll protect your data like it's our own.

3. Straight talking

We'll always talk your language and have your back – no nonsense, no surprises.

4. No spam

You decide what and how you hear from us.

5. Just the essentials

Your info won't just hang about – if we don't need it, we'll delete it.

Protecting Your Privacy

At ASOS, we are 100% committed to protecting your privacy and security. We are customers ourselves of ASOS, so we totally appreciate and respect how important privacy is.

For all ASOS services, the data controller — the company that's responsible for protecting your privacy— is ASOS.com Limited.

Navigating this page

- How we use your information
- Sharing your information
- Marketing messages
- Seeing adverts for ASOS.com online
- Your information and countries outside Europe
- Keeping your information
- Your rights

- [Changes to how we protect your privacy](#)
- [Cookies](#)
- [Contact us](#)

How we use your information

We use your information in a number of different ways — what we do depends on the information. The tables below set this out in detail, showing what we do, and why we do it.

Your Personal Details, such as your name, date of birth, gender, address, email address, social media handle, screen name and phone number.

What we do	Why we do it	Why we need to do it (the legal stuff!)
Identify you when you visit our website or contact us	Checking your identity helps us to keep your information safe from fraudsters	Legally, we have to do this and it is also important for us
Deliver your purchases to you	It's a bit hard to send your order if we don't use your name and contact details!	It's an important part of our contract commitment to you
Send you account and service updates, such as updates to our Terms and Conditions and order confirmations	To keep you informed of any changes to ASOS services	Legally, we have to do this, it's an important part of our contract commitment to you, and it's also important for us to keep you updated
Send you order updates by text, e-mail or through our app	So you know when your order is due to arrive	It's an important part of our contract commitment to you
Manage your participation in any promotions, offers or discount schemes you choose to participate in	To ensure you receive any discounts or offers relevant to you at the time e.g. Student discounts	We will treat this as an important contract commitment to you if you choose to participate

Send you information about our products and services	We like to keep you up to date and help you get the best from our products and services (you can find out more in the section on Marketing messages below)	It's up to you to choose what you hear from us and what you hear about but it's also important for us to tell you about the best product and services we have to offer!
---	--	---

Your body size and shape, if you choose to tell us this

What we do	Why we do it	Why we need to do it (the legal stuff!)
We use a third party to help make recommendations about products, to suggest sizes, and about how garments fit	We want you to love the products you buy from us	It's important to us that you find the right products for you

Your payment information

This means your chosen payment method, for example your card details (don't worry we don't keep the security code)

What we do	Why we do it	Why we need to do it (the legal stuff!)
Take payment, and give refunds	After all - we're not giving all our stuff away!	It's important to us and an important part of our contract commitment to you
Keep a record of any financial transactions with you	We need to know what you have paid for (and we have to tell the tax	Legally, we have to do this

What we do	Why we do it	Why we need to do it (the legal stuff!)
Provide customer service and support	After all, you expect the best service from us!	It's an important part of our service and also part of our contract commitment to you
Improve the services and support we provide to you	So that you get the best possible customer service	It is important for us to train our staff

Purchase history and saved items

What you've bought in the past, what you've searched for - including using our Style Match feature - what you've saved or added to a board for another time, and when you have asked us to tell you that something is back in stock.

What we do	Why we do it	Why we need to do it (the legal stuff!)
Help you keep track of items you like, update you when we have new availability and let you share them, your way	To help you get to the products that you like faster and so you can get the best out of our products and your account	It's up to you if you want to use these services but we would love you to share all our good stuff
Handle returns in accordance with	Because you expect the best service from us and,	It's an important part of our contract commitment to you

and keep it separate from anything else that identifies you.		
We match your purchases to links from affiliates who might have introduced you to ASOS or promoted a particular product when you visited their site. We share relevant purchase history with them, so they know when they have made a successful introduction	We have a number of “introducers” who direct new customers to us or promote our products on their sites	It is important for us to generate new customers through different sources

Information about your phone or laptop, and how you use our website and app

Information collected when you browse our site or use our app, including your IP address and device type, how you use our website and app (such as the pages you visit and the products you look at) and, if you choose to share it with us, your location data.

What we do	Why we do it	Why we need to do it (the legal stuff!)
Identify you when you	If we can remember you,	It is important for us that you

the web	think you will love	like
Monitor visitors to our site and analyse their behaviour	To protect our website and to help make our service better	This is important for us and legally, we have to do this!

Information from Social Media or accounts you link to us

What we do if you link your Social Media or your third-party accounts to us. We will keep a record of your Social Media handle, and the other information that is made available to us according to your Social Media account settings.

What we do	Why we do it	Why we need to do it (the legal stuff!)
We allow you to link your Social Media account to your ASOS account so you can log on simply and easily without having to create	To make it easier for you to use ASOS.com and purchase those items you want!	It is important for us that you get the best shopping experience

We use public sources of information to help us investigate fraudulent activity	To prevent and detect fraud against either you or ASOS – unfortunate, but absolutely essential	This is important for us to protect our service, to protect you and to stop this
---	--	--

Your responses to surveys, feedback and competitions

What we do	Why we do it	Why we need to do it (the legal stuff!)
We occasionally ask for feedback on our products or how you feel	It makes good sense to check how you feel about us and your	It's up to you whether you take part.

	an order, or if you say you are a student	
--	--	--

You don't have to give us all of this personal information but if you don't, you may not be able to buy from the site, and you are unlikely to receive our optimal overall customer experience. But that is your choice – and we respect that.

We also anonymise and aggregate personal information (so that it does not identify you) and use it for purposes including testing our IT systems, research, data analysis, improving our site and app, and developing new products and services.

tackle fraud

You may choose to take advantage of some of our additional services, in which case, depending on your choices we may share your data with the following categories of companies to fulfil the services you have asked for:

How to stop marketing messages from ASOS Marketplace

© 2022 ASOS

v1.0
07.01.2020

[Privacy & Cookies](#) | [Ts&Cs](#)

EXHIBIT 63



Privacy Statement and Cookie Policy

Privacy Policy

It is the policy of Bleichmar Fonti & Auld LLP to handle your personal information responsibly and in accordance with the requirements of applicable data protection laws, including the European Union's General Data Protection Regulation (GDPR) and the California Consumer Privacy Protection Act. This notice explains how we do that.

In this notice, "BFA" refers to Bleichmar Fonti & Auld LLP and its affiliated partnerships. BFA is a limited liability partnership registered under the laws of the State of New York.

Nothing stated in this notice is intended to, nor will it, establish a client-attorney relationship with persons reading it. Information provided to us in the course of any attorney-client relationship enjoys a special status and may be protected by confidentiality, the attorney-client privilege, the attorney work product doctrine and other similar protections (whether in the United States or elsewhere). Nothing in this notice detracts from any of the protections that attach to such information.

The personal information we collect

We may collect personal information from you in the course of our business, including through your use of our website, when you contact or request information from us, when you engage us to provide legal services or as a result of your relationship with any member of our personnel or our clients.

We may collect personal information about you—such as your name, address, telephone number, fax number, e-mail address, etc.—directly from you. For example, personal information may be collected when you fill out a 'Contact Us' form, sign up for our mailing lists, register for events we host or sponsor, submit information online or otherwise provide us information through our website or otherwise. Generally, the information we collect includes your:

- Basic identifying information, such as your name, your preferred form of address, the company you work for, and your job title or position
- Contact information, such as your postal and email addresses, and phone and fax number(s)
- Financial information, such as bank account information needed to process payments
- Technical information, such as information from your visits to our website or in relation to electronic communications we send to you
- Information you provide to us in connection with meetings and events we organize, including access and dietary requirements
- Identification and background information, we collect as part of our client acceptance procedures (which may be provided by third parties)
- Personal information provided to us by or on behalf of our clients or generated by us in the course of providing legal services to them

The personal information we collect may include special categories of data.

How we collect information

Automatically-collected information

We use cookies, log files, pixel tags, local storage objects and other tracking technologies to automatically collect information when users access or use the services or visit our Site, such as an IP address, general location information, domain name, page views, a date/time stamp, browser type, device type, device ID, Internet service provider ("ISP"), referring/exit URLs, operating system, language, clickstream data, and other information about the links clicked, features used, size of files uploaded, streamed or deleted, and similar device and usage information. For more information, see the "Cookies and similar devices" section below.

- We collect information as necessary in the course of providing legal services
- We collect information from monitoring use of our website
- We collect information from monitoring email communications we send and receive
- We receive personal information provided to us directly, for example through our website, when you speak on the telephone with any of our personnel or you register to receive communications from us
- We may collect or receive information about you from other sources. For example we may use publicly available sources to allow us to maintain the accuracy of contact details we hold for you
- We collect information as part of our due diligence procedures when entering into contracts with suppliers or vendors

Our use of personal information

We use the personal information you provide to respond to your request or inquiry and in the ordinary course of conducting our business. Generally, we use the information (including personal information) that we collect online as follows:

Providing support and services

To provide and operate our website, communicate with you about your use of our website, provide troubleshooting and technical support, respond to your inquiries, fulfill your orders and requests, process your payments, communicate with you, and for similar service and support purposes.

Responding to your requests

To respond to your inquiries, fulfill your orders and requests, and consider your request or application (eg, if you have submitted a resume or other application information online or by email, we will use it as part of the application review process).

Personalization

To tailor content we may send or display on the website, including to offer location customization and personalized help and instructions, and to otherwise personalize your experiences.

Newsletters, mailing lists and direct marketing

For direct marketing purposes, including to send you newsletters, client alerts and information we think may interest you. If you are located in a jurisdiction that requires opt-in consent to receive electronic marketing messages, we will only send you such messages if you opt-in to receive them.

Analytics and improvement

To better understand how users access and use the Sites, and our other products and offerings, and for other research and analytical purposes, such as to evaluate and improve our services and business operations and to develop services and features.

Protect our legal rights and prevent misuse

To protect our website and our business operations; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party, or violations of our this Privacy Policy.

Comply with legal obligations

To comply with the law or legal proceedings. For example, we may disclose information in response to subpoenas, court orders, and/or other lawful requests by regulators and/or law enforcement, including responding to national security or law enforcement disclosure requirements.

General business operations

Where necessary, for the administration of our general business, accounting, recordkeeping and legal functions.

Anonymous and de-identified information

We create and use anonymous and de-identified information to assess, improve and develop our business, products and services, and for similar research and analytics purposes.

- To manage our business and our commercial relationships with our clients, suppliers and vendors
- To fulfil our legal and regulatory obligations, including establishing, exercising or defending legal claims
- For the purposes of recruitment
- To provide and improve this website, including auditing and monitoring its use
- To provide information requested by you
- The grounds on which we process personal information
- We process personal information on one or more of the following grounds:
 - For the legitimate business purposes described above
 - On the basis of consent from the relevant individual
 - To perform a contract, including a contract to provide legal services
 - For the establishment, exercise or defense of legal claims or proceedings
 - To comply with legal and regulatory obligations

Sharing personal information

BFA has multiple offices. Personal information that is given to a BFA office may be transferred to one or more other offices in our network (including any office we may open in the future).

We may also share your personal information with third parties in accordance with contractual arrangements in place with them, including:

- other organizations involved in matters for our clients, including local counsel, accountants or auditors, and technology service providers such as data room and case management services
- suppliers or vendors who provide support services to us, such as translation, photocopying or document review
- IT service providers
- organizations who assist us or work alongside us in hosting or organizing events or seminars
- our own professional advisers and auditors

In some circumstances, we may also pass information to regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. We may be required to disclose your information to comply with legal or regulatory

requirements. Where possible, we will use reasonable efforts to notify you before disclosing your information, but we may be legally restricted from doing so.

The information sharing described above may involve a transfer of your information from a location within the European Economic Area (the “EEA”) to outside the EEA, or from outside the EEA to a location within the EEA. The level of information protection in countries outside the EEA may be less than that offered within the EEA. We will implement appropriate measures to ensure that your personal information nevertheless remains protected and secure in accordance with applicable data protection laws. EU standard contractual clauses are in place between all BFA entities that share and process personal data.

Protecting personal information

We use a variety of technical and organizational measures to help protect your personal information from unauthorized access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

Individuals’ rights regarding their personal information

The GDPR and other applicable data protection laws provide certain rights for data subjects. Broadly speaking you have, or may have, the right (as more fully provided in applicable data protection laws)

- to request details of the information we hold about you and how we process it
- to have your personal information rectified if it is inaccurate or deleted
- to restrict our processing of your personal information
- to withdraw a previously provided consent to processing of your personal information
- to stop unauthorized transfers of your personal information to a third party
- to have your personal information transferred to another person
- to complain about our processing of your personal information to a local supervisory authority

It is important to be aware that these rights may not be absolute. For example, if you withdraw your consent to our processing of your personal information, we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

Keeping personal information

Your personal information will be retained in accordance with our Data Privacy Policy.

We retain personal information of different types, or relating to different categories of people, for different periods, taking into account its business purpose. For example, information about individuals who have applied for employment with us will be retained for a shorter period than information about individuals who have actually worked for us.

The periods for which we retain information are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used. We take into account legal and regulatory provisions which require information to be retained for a minimum period. We also consider the limitation periods for taking legal action and good practice in the legal industry.

If you have any questions on the matters covered in this policy, please contact our Data Protection Officer, Sara Simnowitz.

California Consumer Privacy Act

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), we are providing the following additional details

regarding the categories of Personal Information about California residents that we collected, used, and disclosed in the preceding 12 months:

We collected and disclosed the following categories of Personal Information:

Category	We Collected	We Disclosed
A. Identifiers such as name, postal address, online/device identifier, IP address, email address and social media account.	YES	YES, to affiliates, service providers, and other vendors
B. Personal information as defined in the California customer records law, such as name, signature, contact information, and social media account handle and other information you may share or make public on social networks.	YES	YES, to affiliates, service providers, and other vendors
C. Characteristics of protected classifications under California or federal law, which we may collect in order to provide you with our Client Services, such as age.	YES	YES, to affiliates, service providers, and other vendors
D. Commercial information, such as Client Services transaction history, financial details and payment information.	YES	YES, to affiliates, service providers, and other vendors
E. Biometric information, such as fingerprints and voiceprints.	NO	NO
F. Internet or other electronic network activity information, such as browsing history and interactions with our Websites, applications, systems, and emails.	YES	YES, to affiliates, service providers, and other vendors
G. Geolocation data, such as device location and IP location.	YES	YES, to affiliates, service providers, and other vendors
H. Audio, electronic, visual and similar information, such as call recordings and CCTV footage created for safety and security purposes, and audio and video recordings of events, conferences and meetings.	YES	YES, to affiliates, service providers, and other vendors
I. Professional or employment-related information, such as employer name and role/title.	YES	YES, to affiliates,

		service providers, and other vendors
J. Education information subject to the federal Family Educational Rights and Privacy Act, such as student records.	YES	YES, to affiliates, service providers, and other vendors
K. Inferences drawn from any of the personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.	NO	NO

As described above, we collect this Personal Information from you, our affiliates, partner Client Services organizations (such as Pro Bono groups and nonprofits), publicly available databases, social media platforms, and joint marketing partners and event sponsors. Also as described above we may use this Personal Information to operate, manage, and maintain our business, to provide our services, for vendor and employment management, and to accomplish our business purposes and objectives, including, for example, using Personal Information to: provide Client Services; personalize, advertise, and market our services and provide you with content and events of interest; conduct research, analytics, and data analysis; host conferences and events; maintain our facilities and infrastructure; undertake quality and safety assurance measures; conduct risk and security control and monitoring; detect and prevent fraud; perform accounting, audit, and other internal functions, such as internal investigations; comply with law, legal process, and internal policies; maintain records; facilitate corporate transactions; and exercise and defend legal claims.

We have not "sold" Personal Information for purposes of the CCPA. We do not "sell" the Personal Information of minors under 16 years of age.

If you are a California resident, you may have the right to request that we:

1. Disclose to you the following information covering the 12 months preceding your request:
 - The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
 - The specific pieces of Personal Information we collected about you;
 - The business or commercial purpose for collecting Personal Information about you; and
 - The categories of Personal Information about you that we shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such Personal Information
2. Delete Personal Information we collected from you.

To make a request for the disclosures or deletion described above, please use our online form which you can find [here](#), or feel free to contact us in accordance with the Contacting Us section above or by calling at (888) 879-9418.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Information subject to the request. For your protection, we may need to request additional information from you (such as your name, email address, mailing address, and relationship with us) in order to verify your identity and protect against fraudulent requests. We will try to comply with your request as soon as reasonably practicable.

To make a request as an authorized agent on behalf of a California resident, you may use the submission methods noted above. As part of our verification process, we will request that you provide your contact information, relationship to the California resident, documentation verifying your identity, and documentation showing that you are authorized to act as a representative of the California resident (such as a power of attorney or signed written permission from the

California resident).

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

California “Shine the Light” Disclosures

As noted above in we may disclose Personal Information to affiliates of BFA which may use this information for all purposes outlined in this Privacy Policy. Because separate legal entities are considered “third parties” for purposes of California Civil Code Section 1798.83, and certain communications from our affiliates might be viewed as promoting their legal services. If you would like to learn more about this or to make a request to discontinue this type of sharing, please email us at compliance@bfalaw.com or by mail at the following address:

Bleichmar Fonti & Auld Human Resources – Data Privacy
7 Times Square
New York, New York 10028

We will provide a list of the categories of Personal Information disclosed to third parties (i.e., our affiliates) for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We will respond to your request in accordance with applicable law and we reserve our right not to respond to requests submitted other than to the email or mailing addresses specified in this section.

Copyright © 2021 Bleichmar Fonti & Auld LLP All Rights Reserved.

EXHIBIT 64



Privacy and Cookie Policy

This Privacy Policy applies to the collection, use, and transmission of data of and about visitors to **www.bsflp.com** and to other websites maintained by Boies Schiller Flexner LLP and/or Boies Schiller Flexner (UK) LLP (the "Firms") that link to this Privacy Policy.

Our Commitment to Your Privacy

Thank you for visiting the Firms' website. The Firms are committed to protecting and respecting the privacy of visitors to their websites. This Privacy Policy describes:

- how and why we collect certain information from you via the website and the online services provided through the website;
- with whom we share such information;
- how we store that information, including information as to how we secure the information;
- how you can access and update such information; and
- other relevant aspects of our policy.

If you have any questions regarding this Privacy Policy or our information collection and use

practices, please contact us using the information in the "Contact Us" section below.

Information We Collect and How We Use It

Non-personal Information. Like many websites, we may collect certain technical information about your use of the website and generally this is not information the Firms could use to identify you without reference to other information. For example, we may collect your internet protocol (IP) address, browser type, the identity of your internet service provider (ISP), the number and duration of page visits, how you were directed to the website, and the number of clicks you make when you use the website. This does not include demographic information about you. We track and reference your usage information, in aggregation with the usage information of other visitors to the website, to better understand how effective our website is and how visitors interact with it. We may use third parties, such as Google and our website host, to provide analytics services based on this data. The analytics and the underlying data are generally only accessible to the Firms and their third party providers.

In addition, some portions of our website may use session or persistent cookies. A cookie is a file that web servers place on an Internet user's computer. Cookies are designed to store basic information about the user and transmit that information back to servers that recognize them. They may be used to measure visitor behavior on and in connection with a website, including through the transmission of usage information. A session cookie stays on your machine only as long as your browser is open and tuned to the site that placed the cookie. A persistent cookie remains on your machine after you log out of your account and will become active again when you return to the website. Some portions of our website use cookies as described below. You may be able to change your Internet browser settings to reflect your preference for accepting, storing, and/or deleting cookies.

Please note, do not track signals are not effective on our website.

Personal Information

You have the opportunity to submit personal information (such as name, company affiliation, job title, email address, phone number, physical address, and whether or not you are a current firm client) via the website for the following purposes:

- **Receiving BSF communications or publications.**

If you request an eNewsletter, a White Paper, or a subscription to either or a Blog, we use this information to send you the requested publications. The Firms or their service providers may use persistent cookies to identify you as a subscriber and continue to deliver content to you.

- **Registering as an alumnus.** If you choose to register as an alumnus of the firm, we use this information to send you news and updates.

- **Using the My Binder function.** If you choose to sign up to use the “My Binder” function on this website, we use this information to create and permit access to your My Binder account.

- **Asking for further information.** You have the opportunity to provide feedback to us or make inquiries of us through the “Contact Us” link. We use this information to communicate with you as requested.

Sharing of Your Information

We may share your personal information with third parties in one or more of the following ways:

- **Third party service providers, such as website hosts:** We use third parties to host our website. These third parties may have access to your personal information submitted through the website consistent with the hosting of the site.

- Third party organizations that otherwise assist the Firms in providing goods, services or information, including cloud storage providers in the case of firm and client data.
- Successor organizations. In the event the Firms undergo a business transition (such as a merger or acquisition), we may transfer your personal information to the successor organization in such transaction. If material changes to the Firms' privacy practices will occur as a result of the business transition, the Firms will post a notice on the website.
- Auditors and other professional advisers.
- Law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.

We do not share or sell personally identifiable information to third parties for their commercial marketing purposes.

We reserve the right to disclose your personal information as permitted or required by law or regulation.

The information which we may collect from you may be transferred to, stored and processed by us in a destination outside of the European Economic Area (the "EEA"), including the United States and countries whose laws concerning data privacy may not be comparable to those in EEA jurisdictions, but will only be done so in accordance with applicable laws.

How We Store Information Collected from You

We store your personal and non-personal information with the hosting providers and cloud storage providers discussed above. Our administrative departments may store application

information in accordance with firm retention practices.

The Firms will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with our normal procedure, this policy, and all applicable laws.

The Firms use reasonable administrative, technical, and physical security measures to protect your personal and non-personal information, online and offline. Because of the nature of our website, we do not currently encrypt any transmissions to or from the website in any manner. If you are uncomfortable with the unencrypted transmission of personal information described herein, please do not submit information to us through the website.

Our employees, including contract employees, are generally subject to restrictions which limit their use of information obtained from the Firms to the business purpose of providing our services to you.

However, while we take reasonable precautions against possible security breaches of the website and our customer databases and records, no website or Internet transmission is completely secure, and we cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. Owners of personal information are generally advised to take steps to keep their personal information safe to the extent possible.

How to Access and Update Your Personal Information

At any time, you may contact the Firms to request that we:

- provide you with a copy of any personal data pursuant to Article 15 of the EU General Data Protection Regulation (EU) 2016/679 ("GDPR") and/or Section 45 of the Data Protection Act 2018 ("DPA") (to the extent that each of the GDPR and DPA applies to you); and/or

- make changes to your personal information (including deleting such information).

If you request that the Firms update or otherwise modify your information, we will amend your personal information within a reasonable time after your request. To request modifications of personal information that the Firms possesses about you, please contact us using the information in the "Contact Us" section below.

However, please note that, after your personal information is changed, the Firms will continue to have the right to store all personal information collected from you through the website (including personal information which is no longer in active use due to its amendment in accordance with this Section) in our archives and to use and disclose such personal information for certain purposes permitted or required by applicable laws, including as we deem necessary to comply with any applicable law, regulation, legal process or governmental request, to enforce our rights, or to protect the safety and security of our website or other users. For example, we are required by law to retain certain job applicant information for a minimum of three years (although where the GDPR applies we may retain job applicant information for a more limited period of time).

Our Policies Concerning Information from Minors

This website is not intended for children under the age of thirteen and we do not knowingly collect personal information from such children. Children under the age of thirteen should not use our website or provide us with any personal information.

In the event that we learn that we have inadvertently gathered personal information from children under the age of 13, we will use reasonable efforts to erase such information from our records.

Changes to Our Privacy Policy

We reserve the right to modify or amend this Privacy Policy at any time. If such modification includes any significant, material changes, we will provide notice of the update on our website. You should visit the website frequently to remain informed of this policy's current content.

Contact Us

The data controllers are Boies Schiller Flexner (UK) LLP and/or Boies Schiller Flexner LLP.

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices relating to personal data, please send an Email to **privacy@bsflp.com**.

This policy was last updated on April 29, 2020.

Copyright © 2021 Boies Schiller Flexner LLP.
All Rights Reserved.

Attorney Advertising.
Prior results do not guarantee a similar outcome.

LEGAL
PRIVACY AND COOKIE POLICY
LONDON LEGAL NOTICES

VISIT US ON LINKEDIN

EXHIBIT 65



Your use of our Services is governed by our [Terms of Use](#) and Institutional Subscription License Agreement, if applicable. **OUR [TERMS OF USE](#) CONTAIN DISCLAIMERS OF WARRANTIES AND LIABILITY, A BINDING ARBITRATION CLAUSE AND CLASS ACTION WAIVER. THESE PROVISIONS AFFECT YOUR RIGHTS ABOUT HOW TO RESOLVE ANY DISPUTE WITH ENCYCLOPÆDIA BRITANNICA, INCLUDING UNDER THIS PRIVACY NOTICE. PLEASE REVIEW. YOUR USE OF THE SERVICES IS ACCEPTANCE OF THIS PRIVACY NOTICE AND OUR [TERMS OF USE](#).**

Encyclopædia Britannica, Inc. Privacy Notice

Updated: November 10, 2021

Table of Contents

[Introduction](#)

[Cookie Notice & Cookie Policy](#)

[COPPA Compliance](#)

[Information that You Provide to Us](#)

[How We Use Information that You Provide to Us](#)

[Purposes of Processing the Information that You Provide to Us](#)

[Links to Other Websites](#)

[Information Collected Automatically & Other Information; Cookie Policy](#)

[Your Rights & Choices; Opt-Out](#)

[Children's Privacy & Student Data](#)

[Security of Your Information](#)

[Data Storage and Retention](#)

[Consent to Processing and Transfer of Information about You](#)

[Correcting, Updating, or Removing Personal Information; Account Deletion](#)

[Privacy Notice for California Residents](#)

[EU Data Subject Rights](#)

[EU Representative and Data Protection Officer](#)[Copyright](#)[Business Transfers](#)[Acceptance of Privacy Notice Terms and Conditions](#)[Questions, Comments or Complaints](#)

Introduction

Your privacy is important to us. We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Notices sets forth your privacy rights and applies to personal data we may collect:

- Through our free, ad-supported website products, services and platforms;
- Through our free, ad-supported and subscription-based mobile applications;
- Through emails and other electronic communications between you and us (with your consent, where required by law); and
- Through any software provided on or in connection with our website products, services, apps, and emails (collectively, the Services).

The [Children's Privacy & Student Data](#) section of this Privacy Notice applies to personal data we may collect through our BDL Institutional, subscription-based products, services and platforms (collectively, the Institutional Services).

Your decision to use any of our Services and provide your personal data is voluntary. We indicate on our online, mobile, and other registration forms what types of personal data are requested. You may choose not to submit requested information online, or may choose to restrict the use of cookies (see our [Cookie Policy](#) and 'Your Rights & Choices; Opt-Out' below for more information), but that may limit the services we are able to provide to you.

Except for our Institutional Services, the Services are a network of general audience sites, and are not targeted to, and do not knowingly collect personal data from, minors under 16 years of age. We request that these individuals do not provide personal data through the Services. Please see '[COPPA Compliance](#)' below for more information.

We recognize that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Notice as we undertake new personal data practices or adopt new privacy policies. If you have concerns, please contact our data protection officer at dpo@eb.com.

COPPA Compliance

In accordance with the Federal Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly solicit, nor will we accept, personally identifiable information from users known to be under thirteen (13) years of age without the consent of their educational institution or the child's parent or guardian. We do, however, use COPPA-compliant, third party services that automatically collect or share certain information and usage data with us to support our internal operations as described in this Privacy Notice.

If an educational institution with students that are under thirteen (13) years of age uses our Institutional Services, the educational institution also may provide us with personally identifiable information about its students. We use student information to provide the subscribed-to Institutional Service to the educational institution and its students as provided in the [Children's Privacy & Student Data](#) section below.

If you believe that we have collected personal information from someone under the age of 13, please contact us at: privacy@eb.com.

Information that You Provide to Us

Encyclopædia Britannica protects the identity of visitors to the Services by limiting the collection of personally identifiable information. Personal information provided by you to us will not be posted or published by us, and will be shared with third parties only as provided herein. You can enjoy many of our Services and their special features without giving us your personal information.

Please see [Children's Privacy & Student Data](#) below for specific information about children's privacy and our Institutional Services.

Institutional Services

When you or an institution on your behalf subscribes to one of our ad-free Institutional Services, such as [Britannica School](#), [Britannica ImageQuest](#) or [Britannica LaunchPacks](#), we collect information about you (in accordance with applicable privacy laws) that may include (but not be limited to) your name, email address, city, state and age. We may also collect a personal mailing address and a mobile phone number. Subscribers may edit their information at any time to change, add or remove certain personal information. We process your personal information to administer and manage your subscription, deliver subscriber benefits to you, inform you of prizes and

other benefits or opportunities associated with your subscription and respond to your information requests. We may also use this information for legitimate business purposes that help us analyze the demographic of our subscribers and understand our users' needs and interests to better tailor our products and services to meet user needs and deliver additional services to our users. Please see '[Children's Privacy & Student Data](#)' below for more information.

Promotions and other special features

For certain promotions and to access certain features available throughout our Services, including our free, ad-supported services, we collect information voluntarily submitted by you to us to deliver the requested feature that may include (but not be limited to) your name, email address, city, state and age. You may edit this information at any time to change, add or remove it from our Services. We process your personal information to deliver the requested feature to you and to inform you of other benefits or opportunities associated with our Services. We may also use this information for legitimate business purposes that help us understand our users' needs and interests to better tailor our products and services to meet your needs.

Newsletters

You may wish to register for or subscribe to a Britannica newsletter without becoming a Britannica subscriber. To receive these newsletters by email, you must provide us with your email address. We use [Salesforce Marketing Cloud](#), a third-party service provider, to deliver our newsletters to you. When you open an email that contains a newsletter, we gather certain statistics, such as number of emails opened and clicks within a newsletter, using industry-standard technologies, including clear gifs, helping us monitor and improve our newsletters. For more information, please see [Marketing Cloud's Privacy Notice](#). Except for Marketing Cloud, we do not share your voluntarily provided email address with any third party.

You may manage your Britannica newsletter subscriptions by subscribing or unsubscribing at any time using the link included in the related email. Please note that if you have set your browser to block cookies, this may have an impact on your ability to unsubscribe. If you have any difficulties managing your email or other communication preferences with Britannica, please contact us at privacy@eb.com.

Quizzes

Whenever you play our Quizzes, we collect data about your interactions with each Quiz. This information may be associated with your user name, IP address or device ID for the purpose of providing our Services and improving them. In addition, when you play a Quiz, your user name, related photo and Quiz score may be displayed in our

“Quiz Leaderboard” for other players to see. If you do not want your user name and related photo displayed in the Quiz Leaderboard, please refrain from playing our Quizzes.

Logging in using social networking credentials

If you log-in to our Services using a social media (such as Facebook or Twitter) log-in, you are granting permission to the social media service to share your user details with us. This may include your name, email address, date of birth and location, which will then be used to create a Britannica identity. These social media services may use information about your visit to our Services on their pages. If you browse these pages while still logged in to your account with us, information they collect may be connected to your account on their Web site. For more information on how these social media services use information, please review their privacy policies.

Posting from home

You should be aware that if you or your friends post the location of your home and that information is published on a Service it may be available to others and may be published by third parties without our control. To request removal of location data please email us at privacy@eb.com.

Prospect and Referral Information

If a User visits a Service and submits an email address to Britannica but fails to complete the registration or purchase process, we may use such “prospect” information to contact the prospective User from time to time with Britannica offers and information about new features, new services, and special discounts we think the User may see as valuable. Similarly, if a User forwards a Britannica email to a friend, we may use the “referral” information provided to contact the friend from time to time with Britannica offers and information about new features, new services, and special discounts we think the friend may see as valuable. We do not sell or rent any contact information for such “prospects” or “referrals.”

Payment card information

You may choose to purchase goods or services from Britannica using a payment card. Typically, payment card information is provided directly by a User, via the Services, into the PCI/DSS-compliant payment processing service to which the Britannica subscribes, and Britannica does not, itself, process or store your card information.

How We Use Information that You Provide to Us

Subscriber Communications

As a benefit of membership, Britannica subscribers may receive the following communications from us:

- **Communications related to subscription maintenance activities.** These communications may include, without limitation, notices regarding material changes to Britannica Service policies, service updates, service enhancements, and account management procedures. Since these communications are necessary to ensure Britannica provides its subscribers with the highest quality of services, our subscribers are not permitted to opt-out from receipt of these communications.
- **Newsletter Communications.** As a benefit of a Britannica subscription, we may send Britannica subscribers our exclusive Britannica newsletters. To unsubscribe to a newsletter, a User can either (i) follow the instructions at the bottom of any newsletter or (ii) send an email to privacy@eb.com.
- **Communications containing information about Britannica products and services.** We may send promotional emails and other outbound communications to Britannica site subscribers regarding products and services from Britannica. Any Britannica site subscriber that does not wish to receive such product and service communications can choose to remove his or her contact information from our contact list at any time by (i) following the instructions at the bottom of any promotional email or (ii) sending an email to privacy@eb.com.

Non-subscriber communications from us and our approved, third-party partners

If you choose to provide us with personal information on any of our free, ad-supported Services, you may receive the following types of emails from us:

- Emails related to subscription-maintenance activities;
- Emails highlighting new features, content, and usage tips for the Services; and
- Special offers
 - From us for additional Britannica products and services, and
 - From our approved, third-party partners, if you “opt-in” or give us your permission to send them.

When you provide us with your personal information, you can let us know that you do not wish to receive special offers from Britannica or its third-party partners. Also, each special offer will have information available to allow you to “opt-out” if you no longer wish to receive special offers.

Authorized service providers

For legitimate business interests, we may share your personal information with service

providers that perform certain services on our behalf, such as processing credit card payments, performing business and sales analysis, and supporting our Services' functionality.

Business partners

When you make purchases or engage in our promotions, we may share personal information with the businesses with which we partner to offer you those products, services, promotions, contests and/or sweepstakes. When you elect to engage in a particular merchant's offer or program, you expressly authorize us to provide your email address and other information to that merchant.

Surveys

We may occasionally conduct on-line surveys. All surveys are voluntary and you may decline to participate.

Direct mail partners

From time to time we may share our postal mailing list with selected providers of goods and services that may be of interest to you. If you prefer not to receive mailings from these providers, you can notify us at any time by sending an email to privacy@eb.com.

Law enforcement

We also may disclose your information: In response to a subpoena or as otherwise required by law. When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of Britannica, our Users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our Service Terms and Conditions or other agreements or policies.

Purposes of Processing the Information That You Provide to Us

As explained above, Britannica processes your data to provide you with the products and services you have requested or purchased from us, including subscriptions, special features, newsletters and other content. Sometimes we use third-party

providers to facilitate the delivery of the services described above, and these third-party providers may be supplied with or have access to your personal information for the sole purpose of providing services to you on our behalf, such as our newsletters.

We also use your data for legitimate business purposes that enable us to refine our products and services to better tailor them to your needs and communicate with you about other products and services offered by Britannica. In addition, we may disclose your personal information in special legal circumstances. For instance, such information may be used where it is necessary to protect our copyright or intellectual property rights, or if the law requires us to do so.

You can update your personal information and change your marketing preferences at any time by sending an email to privacy@eb.com.

Links to Other Websites

This Privacy Notice only governs information collected on the Britannica Services by Britannica. Our Services contain links to websites or content (including advertisements on our free, ad-supported Services) operated and maintained by third parties, including CafeMedia, over which we have no control. We encourage you to review the privacy policy of a third-party website before disclosing any personal information to the website. Do not supply Personal Information to these sites unless you have verified their security and privacy policies.

Information Collected Automatically & Other Information; [Cookie Policy](#)

Like other commercial websites, Britannica and our authorized partners use cookies (small files transferred from a website to its visitors' hard drives or browsers for record-keeping purposes), including essential, functional and analytical cookies, and other similar information-gathering technologies throughout our Services to collect certain information automatically and store it in log files for a variety of legitimate business interests and purposes. This information may include (but is not limited to) internet protocol (IP) addresses, mobile device identifiers, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about your use of our Services, including a history of the pages you view.

Web beacons, tags, and scripts may be used on our Services or in email or other

electronic communications we send to you. These assist us in delivering cookies, counting visits to our Websites, understanding usage and campaign effectiveness and determining whether an email has been opened and acted upon. We may receive reports based on the use of these technologies by our third-party service providers on an individual and aggregated basis.

Britannica and its authorized partners use cookies, beacons, and other similar technologies on our Services for legitimate business interests that enable us to allow you to navigate our websites, use our Services, and access secure areas of our Services. We also use these technologies for statistical purposes and to analyze and improve the use of our Services and prepare aggregated usage reports.

As described below, on our free, ad-supported Services, we use these technologies for legitimate business purposes to provide standard advertising controls, determine user response to advertisements and promotions, and deliver targeted advertisements that we or our partners believe will be of most interest to you.

We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

We have a legitimate interest in understanding how our users, subscribers, customers, and potential customers use our Services. Among other things, this assists us in providing more relevant products and services. Please refer to our [Cookie Policy](#) and 'Your Rights & Choices; Opt-Out' below for more information.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Services. For more information about cookies, please visit <http://www.allaboutcookies.org/>.

- **Analytics & usage data**

For our legitimate business interests, we may process your personal information for analytic purposes on all of our Services as described in this section.

Together with [Google Analytics](#), we use cookies and software logs to monitor the use of the Services and to gather non-personal information about visitors to the site. These monitoring systems allow us to track general information about our visitors, such as the type of browsers (for example, Firefox or Internet Explorer), the operating systems (for instance, Windows or Macintosh), or the Internet providers (for instance, Comcast) they use. This information is used for statistical and market research purposes to tailor content to usage patterns and to provide services requested by our

customers.

We also have implemented certain [Google Analytics Advertiser](#) features. These tools use cookies to collect and store standard Internet log and visitor information on our behalf, including information about what pages you visit, how long you are on our sites, how you got here, and what you click on during your visit. This Google Analytics data is not tied to personal information, so this information cannot be used to identify who you are. We use the data provided by Google Analytics to develop our services and content around our User demographics, interests, and behavior on our Services. You can opt-out of this Google Analytics Advertiser feature using the Ads Settings located at <https://www.google.com/settings/ads>. In addition, you can use the [Google Analytics Opt-Out Browser Add-on](#) to disable tracking by Google Analytics. To delete these cookies, please see your browser's privacy settings or follow the above instructions.

We may also receive other data about your use of our Services from other sources. This information may include (but is not limited to) information about your activities across unrelated websites and mobile applications, information about the possible relationships between different browsers and devices and information that we receive from our third-party service providers. We may add this information to the information to the information we have already collect through our Services.

- **Advertising on our free, ad-supported Services**

Our free (non-subscription) Services are supported by advertising and, as more fully described [below](#), Britannica works with third parties to display advertising, including interest-based or behavioral advertising, on the Services.

We participate in the IAB Transparency & Consent Framework and comply with its [Specifications and Policies](#). Except with respect to Britannica Online (www.britannica.com), our Consent Management Platform (CMP) is OneTrust LLC with the CMP identification number 28.

Our Britannica Online Service (www.britannica.com) is affiliated with CMI Marketing, Inc., d/b/a CafeMedia (“**CafeMedia**”) for the purposes of placing advertising on the Service, and CafeMedia will collect and use certain data for advertising purposes. CafeMedia's CMP is LiveRamp with the CMP identification number 3. To learn more about CafeMedia's data usage and your related rights, click here: [CafeMedia Advertising Privacy Policy](#).

We also may work with DigiTrust to set a cookie in your browser to enable us and [DigiTrust Partners](#) to collect web viewing data that includes visits to a Britannica Service and other non-affiliated websites over time. This data may be used to infer whether you share interests with other Users and deliver advertising relevant to those

inferences. You can exercise choice about the collection of data in this way for interest-based, behavioral advertising by visiting the [Digital Advertising Alliance's choice page](#) and opting out from DigiTrust or use one of the links provided [below](#). Opting out from DigiTrust will stop DigiTrust Partners from using the DigiTrust identifier. Through the DAA choice page, you may make other choices for companies that participate in the DAA, some of which are DigiTrust Partners.

Our ad-supported Services may also rely on third-party service providers to do things like: take user-level information, anonymize it through hashing (a hashed email address might look something like this: **e820bb4aba5ad74c5a6ff1aca16641f6**) and match it against other anonymized, people-based identifiers – doing this helps us serve you personalized, relevant advertisements. Specifically, when you use our ad-supported Services, we may share information that we may collect from you, including your email (in hashed form), IP address or information about your browser or operating system, with our third-party service providers, Index Exchange (IX) and LiveRamp Inc. and its group companies ('LiveRamp'). IX and LiveRamp may use our first party cookie on your browser to match your shared information to their marketing databases in order to provide back a pseudonymous privacy-centric identifier for our use in real time bidding in digital advertising. These third parties may in turn link further demographic or interest-based information to your browser. You have the choice to opt-out of the use of your data by third-party service providers for this purpose at any time. Please find more information about opting out [below](#).

Please note that limiting third-party cookies via your browser controls does not prevent our first-party cookies from being set in this way. Also, please know, if you opt-out of interest-based advertising you will continue to receive ads on our free, ad-supported Services, but not behaviorally targeted ads. Also, if you opt-out of Britannica's practices, you may continue to receive interest-based advertising through other companies. If you erase your browser's cookies, you may need to perform this process again.

- **Anonymous data**

Anonymous aggregated data may be provided to other companies we do business with for statistical purposes. For example, we may report to advertisers that a certain percentage of our site's visitors are adults between the ages of 25 and 35.

- **Device identifiers**

For our legitimate business interests, we process your device identifiers as described in this section.

When you use a mobile device like a tablet or cell phone to access our Services, we

may access and monitor one or more “device identifiers.” Device identifiers are small data files associated with your mobile device that uniquely identify your mobile device. A device identifier may deliver information to us or a third party partner about how you browse and use the services and may help us or others provide reports or personalized ads. Some features of the services may not function properly if use or availability of device identifiers is impaired or disabled.

Third-party activities

For our legitimate business interests, and with your consent where this is required, we may process data collected by us for advertising, including interest-based advertising, as described in this section.

As described above, in order to monetize our free, ad-supported Services, we work with third-party advertisers and advertising networks that use cookies and other similar technologies to target ads served to our free, ad-supported Services. Our Privacy Notice does not cover the use of data that you provide directly to advertisers or third-party partners; that usage is governed by the advertiser’s or third party partner’s privacy policy.

What does it mean to “serve ads”? When you visit a website, your Internet browser transmits a “request” to the computer that hosts the website (the “host server”) requesting that server to send you (or “serve”) the Web page that you are seeking. Most Web pages contain components that are pulled from different sources, for example, a Web page at a news site may get its weather section from one provider, its sports results from a different source, and advertisements from other servers. Our Web pages contain coding that directs your browser to fill the ad spaces on the Web pages with content served by advertisers and networks of advertisers to whom we have sold the ad spaces. The advertisers and networks use cookies and beacons to help manage ad delivery and frequency and to identify audience segment(s) for customized advertising (“targeting”). These cookies are used to identify your IP address, so that when you visit another website using the same advertising network, the network will recognize the cookie as one of its own, read the information on the cookie (the record of which sites in the network you have visited) and serve you an ad that you might be interested in, based on your past visits to other sites in the network. Advertising targeted based on past Web surfing is known as “behavioral advertising.”

Britannica does not provide any personal information to third-party advertisers about visitors to the Services. Our Privacy Notice does not cover the use of information that they may have collected from you by third parties on other sites. If you would like to learn more about behavioral advertising or to opt-out of having this information used by companies that are part of the Network Advertising Initiative to deliver targeted ads, please visit <http://www.networkadvertising.org>. Many of the same companies are

members of the Self-Regulatory Program for Online Behavioral Advertising. You can learn more and opt-out of receiving targeted ads from them at <http://www.aboutads.info/choices>.

Some advertising networks require that we specifically list their opt-out links below. When you opt-out of a network, you may receive a “opt-out” cookie so that the network will know not to assign you new cookies in the future. You will continue to receive ads from that network, but not behaviorally targeted ads. If you erase your browser’s cookies, you may need to perform this process again.

- Exponential Interactive, Inc. has a legitimate interest to collect and profile personal data in the form of IP address and cookie ID from users on our website in order to provide targeted online advertising and ad measurement. For more details including opt-out requests, access requests, or complaints, please review their [privacy policy](#) or contact their data protection officer via [privacy@exponential.co.uk](#)

Your Rights & Choices; Opt-Out Choices

We participate in the IAB Transparency & Consent Framework and comply with its [Specifications and Policies](#). Our Consent Management Platform (CMP) is OneTrust LLC with the CMP identification number 28.

Our [Cookie Policy](#) more fully describes the cookies, beacons and other similar technology used on the our Services and provides information on when and how users can accept or reject them.

You can opt-out of being behaviorally targeted by Britannica (and other companies employing online advertising) via the following options:

- [Digital Advertising Alliance](#)
- [Digital Advertising Alliance Canada](#)
- [European Digital Advertising Alliance](#)
- [Network Advertising Initiative](#)

Please remember, if you opt-out of interest-based advertising you will continue to receive ads on our free, ad-supported Services, but not behaviorally targeted ads. Also, if you opt-out of Britannica’s practices, you may continue to receive interest-based advertising through other companies.

Browser controls

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Services. For more information about cookies, please

visit <http://www.allaboutcookies.org/>. Please note that limiting third-party cookies via your browser controls does not prevent our first-party cookies from being set in this way.

- To manage or delete browser cookies, please see your browser's privacy settings.
- To manage or delete Flash cookies, please use the Adobe Flash Player Settings Manager here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html

Google Analytics

You can control the use of your personal data by Google Analytics by visiting the 'Your privacy controls' section of the Google Privacy Policy located at <https://policies.google.com/privacy?hl=en-US#infochoices>. You also can use the Google Analytics Opt-Out Browser Add-on to disable tracking by Google Analytics. To delete these cookies, please see your browser's privacy settings or follow the above instructions.

IX & LiveRamp

You can control the use of your personal data by IX and LiveRamp as follows:

IX's options for users to opt-out of personalized advertising can be found on the IX website at this link: <https://www.indexexchange.com/privacy/>. IX may continue to add opt-out options.

To opt out of LiveRamp's use of your personal data, please head here: https://liveramp.com/opt_out/.

How we respond to "Do Not Track" signals

When you visit a website in any browser, you automatically share information with that website, such as your IP address, and other standard PC information. If the website contains content provided by a third-party website (for example a web measurement tools such as a web beacon or scripts), some information about you may be automatically sent to the content provider. This type of arrangement has several benefits, such as allowing you to access third-party content from our Services conveniently. Some internet browsers or other tools include "Do Not Track" (DNT) features that, when turned on, send a signal to websites you visit indicating you do not wish to be tracked across websites over time. However, since no technology standard for DNT signals has been developed or adopted to date, our Services do not currently respond to DNT signals.

Children's Privacy & Student Data

A note to minors: If you are under the age of 16, please get permission from your parent/legal guardian or school before using the Services. If we discover that we have collected any personally identifiable information from a child under the age of 16 without the proper consents required by law, we will suspend the associated account and/or remove that information from our database as soon as possible.

Britannica does not knowingly collect or solicit personally identifiable information from or about children under 16, except as permitted by law or otherwise provided herein. If we discover we have received any information from a child under 16 in violation of this policy, we will delete that information immediately. If you believe Britannica has any information from or about anyone under 16, please email us at privacy@eb.com.

Student Data

If you are a student with access to our Institutional Services through an Institutional Subscription License Agreement between your school institution and us, your student service data is processed in a way that is COPPA- and FERPA-compliant. As you use this site, you will enter student data or interact with student data that has already been entered. Under the terms of our contracts with school institutions, we agree to act as a "School Official" as defined by the Family Educational Rights and Privacy Act (FERPA), meaning that we:

- Perform an institutional service or function for which the school or district would otherwise use its own employees;
- Have been determined to meet the criteria set forth in the school's or district's annual notification of FERPA rights for being a School Official with a legitimate educational interest in the education records;
- Are under the direct control of the school or district with regard to the use and maintenance of education records; and
- Use education records only for authorized purposes and will not re-disclose from education records to other parties (unless we have specific authorization from the school or district to do so and it is otherwise permitted by FERPA)

However, FERPA requires limitations on disclosure of those records and implementation of appropriate security measures to protect those records. To help your school district comply with FERPA, we have adopted certain practices, and require that educators using this site fulfill certain responsibilities to safeguard student data.

The following statement explains our practices and your responsibilities regarding the

student data you enter on this site.

Student Data Security & Confidentiality Statement

Purposes of Data Entry

You control what student data is entered on this site and you retain ownership of the student data at all times. Student data entered on this site should be limited to information that is relevant to the legitimate educational purpose of improving student performance. We will not ask you to enter, and you are instructed not to enter, data about students that is not relevant to this legitimate educational purpose.

Therefore, only a minimum amount of personally identifiable student data required for the setup of the system is requested. Additional data, not specific to the student, is also required to complete system setup, including the teacher first and last name, class name, grade level, and school name.

Use, Disclosure, and Storage

We will use the student data to provide the services to your school institution. We will not keep the student data after you or the school district instructs us to delete it.

We will only disclose student data to authorized employees or representatives of the school institution, and will not knowingly disclose the student data to any third person without express written authorization. When, at the request of the school institution, we acquire assessment or other information, including personally identifiable student data, from a third party source we treat that information with the same confidentiality and security safeguards as though it were provided directly by the school institution. Additional agreements may be required by the third party to authorize transmission of data to us.

Your school institution may from time to time request that we provide student data to third parties of its choosing. We will do so with written authorization, which acknowledges that we are providing that data as the requesting institution's agent and that once the data is received by the third party, we no longer has any control over the use or disposition of the data.

We may also use aggregated data in our research, product development, and marketing. That aggregated, non-personally identifiable data (e.g., summary or statistical data) may be shared with third parties. However, we do not use personally identifiable student data to market any products or services directly to students or their parents.

In the event that we wish, from time to time, to release aggregated data that identifies a school or school district by name, we will enter into a separate agreement with the institution to authorize release and publication.

We do not utilize third parties to provide products and do not share your student data with any third parties.

Security of Your Information

Any personally identifiable information collected through this site is stored on limited-access servers. We will maintain safeguards to protect these servers and the information they store. In addition, to help protect the privacy of data and personally identifiable information you transmit through use of our Services, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We strive to restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we strive to tell all our employees about the importance of confidentiality and maintaining the privacy and security of your information.

Data Storage and Retention

Your personal data is stored by us on our servers located in the United States, Australia and India. We retain your information for the duration of your business relationship with us and as long as necessary to permit us to use it for the legitimate business purposes that we have communicated to you and comply with applicable law or regulations. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact the Encyclopædia Britannica's data protection officer at dpo@eb.com.

Consent to Processing and Transfer of Information about You

Encyclopædia Britannica's headquarters are in the United States. Information we collect from you will be processed in the United States and may be stored, transferred to, and processed in any country where we have facilities or in which we engage service providers. These countries may be outside your country of residence, including the United States, and may have different data protection laws than your country.

If you are located in the European Economic Area (EEA), Encyclopædia Britannica collects and transfers personal data out of the EEA only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of Encyclopædia Britannica in a manner that does not outweigh your rights and freedoms. Encyclopædia Britannica endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with us and the practices described in this Privacy Notice.

Correcting, Updating, or Removing Personal Information; Account Deletion

Users may opt out of certain Services or correct, update, or remove certain personal information that Britannica has collected about them through any of the means listed below. Please be sure to include the following information in your correspondence:

Your email address

Your first and last name

Your mailing address (street, city, state, zip code, and country)

The name of the Britannica Service to which the request applies

Email us at:

privacy@eb.com

Call us at:

(800) 323-1229 (within the United States), or

(312) 347-7159 (outside the United States)

Monday – Friday, 8:00 a.m. to 6:00 p.m. (U.S. Central Time).

Write us at:

Britannica Customer Service, Attn: Removal from Mailing List

325 North LaSalle Street, Suite 200

Chicago, IL 60654-2682

Please allow up to six (6) weeks for mailed-in or faxed opt-out requests to be processed.

Account Deletion:

If you no longer wish to have a registered account, you may terminate your account by

sending an email to privacy@eb.com. Because of the way we maintain the Britannica Services, such deletion may not be immediate, and residual copies of your profile information or posts may remain on backup media for up to ninety (90) days.

Privacy Notice for California Residents

This Privacy Notice for California Residents supplements the information contained elsewhere in this Privacy Notice and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

Information We Collect

Our websites, software applications (apps), emails (with your consent, where required by law), and other products, services and platforms collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, our websites, apps, emails, and other products, services and platforms may have collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Collected
A. Identifiers	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	YES
C. Protected classification characteristics under California or federal law	NO
D. Commercial information.	YES
E. Biometric information.	NO

F.	Internet or other similar network activity.	YES
G.	Geolocation data.	YES
H.	Sensory data.	NO
I.	Professional or employment-related information.	NO
J.	Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	YES
K.	Inferences drawn from other personal information.	YES

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a newsletter or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we or our third-party service providers will use that

information to process your payment and facilitate delivery. We may also save your information to facilitate new product or service orders and requests.

- To provide, support, personalize, and develop our websites, apps, emails, and other products, services and platforms.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including investigating and addressing your concerns and monitoring and improving our responses.
- To personalize your website, apps, emails, or other product, service or platform experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our websites, apps, emails, and other products, services and platforms.
- To help maintain the safety, security, and integrity of our websites, apps, emails, and other products, services and platforms, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our websites, apps, emails, and other products, services and platforms.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Website users is among the assets transferred.

The Company will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

The Company may disclose your personal information to a third-party for a business purpose or sell your personal information, subject to your right to opt-out of those sales (see '*Sales of Personal Information*' below). When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you

have received explicit notice and an opportunity to opt-out of further sales (see ‘*Sales of Personal Information*’ below).

We may share your personal information with the following categories of third parties:

- Subsidiaries and affiliates.
- Contractors and service providers.
- Data aggregators.
- Third parties with whom we partner to offer products and services to you.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, the Company has disclosed the following categories of personal information for a business purpose:

[Category A: Identifiers.]

[Category B: California Customer Records personal information categories.]

[Category F: Internet or other similar network activity.]

[Category G: Geolocation Data.]

[Category K: Inferences drawn from other personal information.]

Sales of Personal Information

Except with respect to our Institutional Services, in the preceding twelve (12) months, the Company has sold the following categories of personal information collected through our ad-supported Services:

[Category A: Identifiers.]

[Category F: Internet or other similar network activity.]

[Category G: Geolocation Data.]

[Category K: Inferences drawn from other personal information.]

The Company and our advertising partners collect the personal information identified above (such as the cookies stored on your browser, the advertising identifier on your mobile device, or the IP address of your device) when you visit our websites, apps, and other products, services and platforms, or open our emails. We, and our partners, use this information to tailor and deliver ads to you on our websites, apps, emails, and other products, services and platforms, or to help tailor ads to you when you visit others’ sites (or use others’ apps). To tailor ads that may be more relevant to you, we and/or our partners may share the information we collect with third parties.

If you do not wish for us or our partners to sell your personal information to third parties for advertising purposes, click the “**Do Not Sell My Info**” link accessible from the pages of our websites, apps, and other products, services and platforms. Note that

although we will not sell your personal information after you click that button, we will continue to share some personal information with our partners (who will function as our service providers in such instance) to help us perform advertising-related functions such as, but not limited to, measuring the effectiveness of our ads, managing how many times you may see an ad, reporting on the performance of our ads, ensuring services are working correctly and securely, providing aggregate statistics and analytics, improving when and where you may see ads and/or reducing ad fraud. If you access our websites, apps, and other products, services and platforms from other devices or browsers, visit our **“Do Not Sell My Info”** link from those devices or browsers to ensure your choice applies to the data collected when you use those devices or browsers. Additionally, although clicking the **“Do Not Sell My Info”** link will opt you out of the sale of your personal information for advertising purposes, it will not opt you out of the use of previously collected and sold personal information (except for personal information sold within 90 days prior to your exercising your right to opt out) or all interest-based advertising. If you would like more information about how to opt out of interest-based advertising in desktop and mobile browsers on a particular device, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#>. You may download the AppChoices app at <http://www.aboutads.info/appchoices> to opt out in connection with mobile apps, or use the platform controls on your mobile device to opt out.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that the Company disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, we will identify the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that the Company delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (800) 323-1229; Monday-Friday, 8:00 a.m. to 6:00 p.m. (U.S. Central Time)
- Emailing us at dpo@eb.com

Only you, or a person registered with the California Secretary of State that you

authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing in accordance with CCPA requirements.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by emailing privacy@eb.com.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by clearing cookies from your browser or emailing privacy@eb.com.

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for like-goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of like-goods or services.
- Suggest that you may receive a different price or rate for like-goods or services or a different level or quality of like-goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. We currently provide the following financial incentives:

COMING SOON

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our websites, mobile applications, and other products, services and platforms that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to dpo@eb.com or write us at: Encyclopædia Britannica, Inc., Attn: M.G. Kim, DPO, 325 N. LaSalle Street, Suite 200, Chicago, Illinois 60654.

Changes to Our Privacy Notice

The Company reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website at <https://corporate.britannica.com/privacy-policy/> and update the notice's effective date. **Your continued use of our websites, mobile applications, and other products, services and platforms following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which the Company collects and uses your information described herein, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (800) 323-1229; Monday-Friday, 8:00 a.m. to 6:00 p.m. (U.S. Central Time)

Website: www.britannica.com

Email: dpo@eb.com

Postal Address: Encyclopædia Britannica, Inc.
Attn: M.G. Kim, DPO
325 N. LaSalle Street, Suite 200
Chicago, Illinois 60654

EU Data Subject Rights

The EU GDPR and other countries' privacy laws provide certain rights for data subjects. A good explanation of them (in English) is available on the website of the United Kingdom's [Information Commissioner's Office](#).

If you wish to confirm that Encyclopædia Britannica is processing your personal data, or to have access to the personal data Encyclopædia Britannica may have about you, please contact us at dpo@eb.com.

EU Representative and Data Protection Officer

Encyclopædia Britannica is headquartered in Illinois USA. Encyclopædia Britannica has appointed an EU representative and data protection officer for you to contact if you have any questions or concerns about Encyclopædia Britannica's personal data policies or practices.

Our EU representative's name and contact information are:

Encyclopædia Britannica EU Representative
Unity Wharf, 13 Mill Street
London SE1 2BH UNITED KINGDOM
GDPR_EURep@eb.com

Our data protection officer's name and contact information are:

M.G. Kim
Encyclopædia Britannica Data Protection Officer
325 N. LaSalle Street, Suite 200
Chicago, IL USA 60654
dpo@eb.com

Copyright

All of the content on the Services is copyrighted by Encyclopædia Britannica, Incorporated, 354 N. LaSalle St., Suite 200, Chicago, Illinois 60654, or its licensors, and it cannot be redistributed or used for commercial purposes. More detailed information about Encyclopædia Britannica's copyrights and trademarks is available in our [Terms of Use](#).

Business Transfers

As we continue to develop our business, we might sell or buy subsidiaries, or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice or Policy (unless, of course, the customer consents otherwise). Also, in the unlikely event that Encyclopædia Britannica, or substantially all of its assets are acquired, customer information will be one of the transferred assets, and will remain subject to our Privacy Notice.

Acceptance of Privacy Notice Terms and Conditions

By using this site, you signify your agreement to the terms and conditions of this Encyclopædia Britannica Privacy Notice. If you do not agree to these terms, please do not use this site. We reserve the right, at our sole discretion, to change, modify, add, or remove portions of this policy at any time. All amended terms automatically take effect 30 days after they are initially posted on the site. Please check this page periodically for any modifications. Your continued use of any of the Services following the posting of any changes to these terms shall mean that you have accepted those changes.

Questions, Comments or Complaints

If you have questions about Encyclopædia Britannica or its products, visit our [Contact Us](#) page to find email addresses and other contact information for the appropriate department. To correct, update, or remove personally identifiable information, please email us at dpo@eb.com. If you have any questions or concerns, please send an email to privacy@eb.com or at dpo@eb.com.

Our Sites	International	Mobile
Britannica.com	Australia	iPhone App
Merriam-Webster	Brazil	iPad App
Britannica Kids	China	Britannica Kids Apps
ProCon	Japan	
School & Library Products	Latin America	

Britannica Books

United Kingdom

About

[Company](#)
[Our Team](#)
[We're Hiring](#)
[Contact](#)

Stay Connected

[Facebook](#)
[Twitter](#)
[YouTube](#)
[Newsletters](#)

Partner with Us

[Experts](#)
[Syndication](#)
[Advertise](#)

ENCYCLOPÆDIA
Britannica

[Privacy Policy](#) • [Terms of Use](#) • Copyright 2022 Encyclopædia Britannica, Inc. Corporate Site. All rights reserved.

EXHIBIT 66

BURBERRY

NEW IN

WOMEN

MEN

CHILDREN

OUTERWEAR

BAGS

GIFTS



0

[Terms & Conditions](#)[Privacy Policy](#)[Cookie Policy](#)[Do Not Sell My Personal Information](#)[Accessibility Statement](#)[Japan only - SCTL indications](#)[Transparency in the Supply Chain and Modern Slavery Statements](#)[Privacy Policy of Burberry Korea Limited. \(Customer\)](#)

Introduction



Last updated: December 2021 version: 202112_10

Burberry is committed to respecting your privacy and complying with applicable laws and regulations to ensure that the personal information you give us is kept appropriately secure and processed fairly and lawfully.

Burberry Limited is a company incorporated and registered in England and Wales with company number 00162636 (referred to in this Policy as "we", "us" and "our"). Burberry's representative in the European Union ("EU") is Burberry Italy srl, Via Manzoni, n.20, Milan 20121, Italy ("Burberry EU Representative").

Your personal information will be held and managed by Burberry Limited. By visiting and using Burberry's website or mobile site (www.burberry.com) (the "SITE") or any Burberry application ("APPLICATION") that we make available from time to time or by visiting a Burberry store for the purchase or sampling of products or for interacting with our content and/or services or by contacting our Customer Services Team, you acknowledge that you have read this Privacy Policy. You must be at least 13 years' old to use the Site and Applications (14 years' old if you are a customer in mainland China or 18 years' old if you are a customer in Saudi Arabia). If you are under 13 (or 14 in mainland China or 18 in Saudi Arabia) or a minor in your country or state or region of residence, please ask your parent or legal guardian to provide their information for you.

This Privacy Policy covers all personal information about you that we collect, use and otherwise process in connection with your relationship with Burberry as a customer or potential customer. Burberry will collect and use your personal information as described in this Privacy Policy and as permitted by applicable laws, including in circumstances where: (i) it is necessary to provide or fulfil a service requested by or for you; (ii) you have given us your consent; or (iii) it is necessary for one or more of the following legitimate interests pursued by Burberry:

- To analyse, profile and monitor customer patterns and better understand the interests and preferences of our key customer audiences so we can consistently improve our products and services.

- To offer an enhanced customer experience and service, including by ensuring we personalise the Site and Application and (if applicable) Burberry



appropriate steps by identifying and protecting sensitive transactions.

- To analyse the footfall in Burberry stores and at Burberry promotions or events for internal reporting purposes and to ensure adequate and appropriate product and resources.
- To ensure we continue to comply with applicable laws, for example in maintaining the accuracy of our records.

What Personal Information We Collect And How We Use It



How Personal Information May Be Collected



Receiving And Unsubscribing From Burberry Updates



Who We Share Your Personal Information With



Your Rights In Relation To Your Personal Information



Retention And Deletion Of Personal Information



Security And Third Party Links



Children’s Privacy



In-Application Virtual Activation



Changes To This Privacy Policy



Contacting Burberry



**BURBERRY**

NEW IN WOMEN MEN CHILDREN OUTERWEAR BAGS GIFTS

**EMAIL SIGN-UP**

Sign up for email updates on the latest Burberry collections, campaigns and videos.

Email*

**DOWNLOAD OUR APP**[More details](#)**STORE LOCATOR**[View All Stores](#)**FOLLOW US**

Customer Service ▾

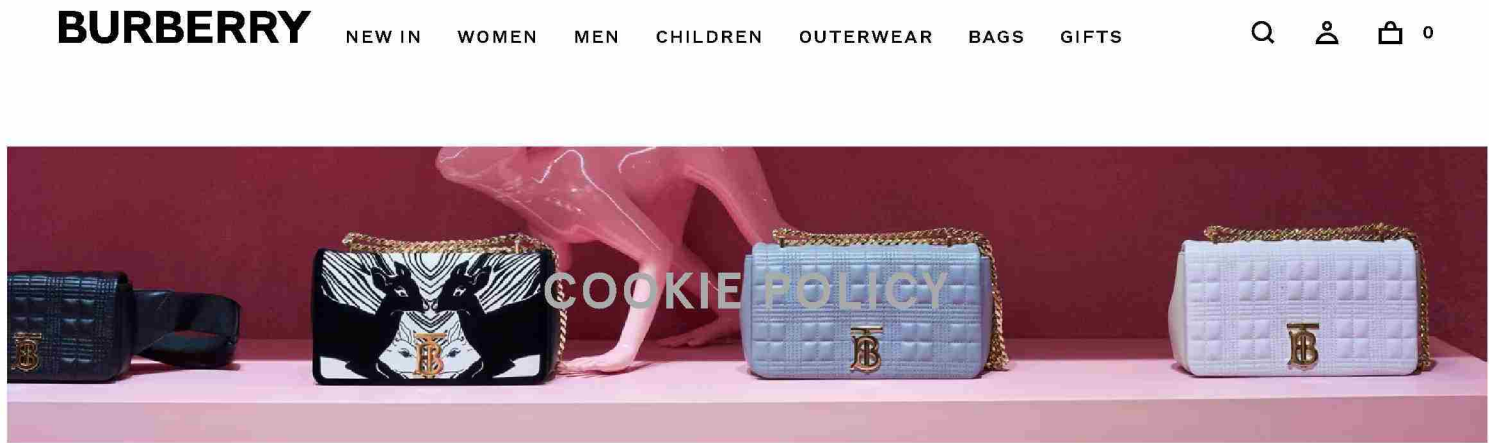
Our Company ▾

Legal & Cookies ▾

Shipping to [United States \(\\$\)](#)Language [English](#)[Do Not Sell My Personal Information \(CCPA\)](#)

If you are using a screen-reader and are having problems using this website, please call [+1 877 217 4085](#) or [contact us](#) for assistance.

EXHIBIT 67



[Terms & Conditions](#)

[Privacy Policy](#)

[Cookie Policy](#)

[Do Not Sell My Personal Information](#)

[Accessibility Statement](#)

[Japan only - SCTL indications](#)

[Transparency in the Supply Chain and Modern Slavery Statements](#)

[Privacy Policy of Burberry Korea Limited. \(Customer\)](#)

Introduction



Cookies are small pieces of information which are issued to your computer when you visit a website and which store and sometimes track information about your use of the site. We use cookies to elevate your user experience and the quality of our site and service. When you enter our site our web server sends a cookie to your computer which allows us to recognise your computer. By associating the identification numbers in the cookies with other customer information when for example you log-in to the site, then we know that the cookie information relates to you.

Local storage is technology which allows a website or an app to store and retrieve data on your mobile phone or other device. We use local storage to enable certain features, including to store certain parts of our site on your device so that those pages load more quickly when you next visit them. You can control the use of local storage using your browser settings.

By proceeding beyond this page you consent to our cookie and local storage settings and agree that you understand this Cookies Policy which explains how you can manage your cookie and local storage choices and preferences. Please be aware that restricting cookies and/or local storage will impact on your user experience and may prevent you from using part of our website.

Why do we use cookies?



Managing your cookie preferences



[EMAIL SIGN-UP](#)

[DOWNLOAD OUR APP](#)

[STORE LOCATOR](#)

Sign up for email updates on the latest Burberry collections, campaigns and videos.

[View All Stores](#)

X

BURBERRY

NEW INWOMENMENCHILDRENU OUTERWEARBAGSGIFTS

Q

0

Customer Service

Our Company

Legal & Cookies

Shipping to [United States \(\\$\)](#)

Language [English](#)

[Do Not Sell My Personal Information \(CCPA\)](#)

If you are using a screen-reader and are having problems using this website, please call [+1 877 217 4085](#) or [contact us](#) for assistance.

<https://us.burberry.com/legal-cookies/cookie-policy/>

2/2

GOOG-CABR-05877411

EXHIBIT 68



[ABOUT](#) [PRESS](#) [JOBS](#) [CONTACT](#) [INVESTORS](#) [LEGAL](#)

LEGAL AT BUZZFEED

Read Legal Terms For

US Edition

[Privacy Policy](#)

[User Agreement](#)

[DMCA](#)

BuzzFeed's Privacy Policy and Cookie Policy

LAST UPDATED: October 8, 2021

Welcome to BuzzFeed's **Privacy Policy and Cookie Policy**. This Privacy Policy explains how we collect, use, and disclose personal data (as defined herein) related to your use of our Services.

California users you can find out about your privacy rights "[Privacy Information for California Residents](#)" section.

- [1. Who we are](#)
- [2. About this privacy notice](#)
- [3. Changes to this privacy notice](#)
- [4. How to contact us](#)
- [5. Personal data we collect and how](#)
- [6. Aggregated data](#)
- [7. How we collect personal data](#)
- [8. Marketing Choices](#)
- [9. Sharing your personal data](#)
- [10. UK and EU users: international transfer of your personal data](#)
- [11. Retaining your personal data](#)
- [12. Third-Party Sites](#)
- [13. Cookie policy](#)
- [14. Privacy information for EEA and UK users](#)
- [15. Privacy Information for California Residents](#)
- [16. BuzzFeed legal entities](#)

1. Who we are

When we mention “BuzzFeed”, “we”, “us” or “our” in this Privacy Policy, we mean BuzzFeed, Inc, or the relevant BuzzFeed company responsible for processing your data. BuzzFeed legal entities are listed in our [section 16](#).

2. About this privacy notice

This Privacy Notice explains how BuzzFeed collects, uses, and discloses data about you and processes information that identifies or can be used to identify you (sometimes referred to as “personal data” or “personal information” under applicable privacy and data security laws, and hereinafter “personal data”) when you use our website(s), mobile apps, and other online products or services that link to this Privacy Policy (collectively, the “Services”) or when you otherwise interact with us. From time to time we partner with third parties to provide you with products, promotions or other experiences. We will show you the privacy policies belonging to those third parties when they will receive information in connection with those experiences. Their privacy policy will govern the collection of your personal data, in addition to this Privacy Policy.

3. Changes to this Privacy Policy

We’re likely to update this Privacy Policy in the future and when we make changes, we will revise the date at the top of the policy and, in some cases, will notify you through the Services, such as on our homepage, or via email or other communication. Please come back and check from time to time for the latest information on our privacy practices.

4. How to contact us

If you have questions or concerns about the information in this Privacy Policy, our handling of your personal data more generally, your choices and rights regarding such use, or wish to exercise your rights under law, please do not hesitate to contact us at:

BuzzFeed, Inc.
111 E. 18th St.
New York, NY 10003
Attn: Office of the General Counsel
data-privacy@buzzfeed.com

5. What personal data we collect and how

5.1 Personal data you provide to us.

We collect data you provide directly to us.

- **Account data.** If you sign up for a BuzzFeed.com account (“Account”), we will collect data you give us related to your Account, including your name, email address, username and password. We describe this more fully in Section 5.4 below.
- **Payment data.** To order products or services through our Services, you may need to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments. We will collect the data we need in order to process that purchase (for example, payment

details). However, your financial information is collected and stored by our third party payment processing company, and use and storage of that data is governed by the third party payment processor's applicable privacy policy.

- **Purchase data.** If you make a purchase from a third party after clicking on an affiliate link through the Services, we will receive data about the purchase for the purpose of managing our business relationship.
- **Additional Account data.** You may provide additional data as part of your Account (such as your personal description). This data will be publicly visible to others. If you do not wish to share this information with us or others, do not provide the information as part of your Account.
- **Other data you share through the Services.** You may provide us with data when you fill in a form, conduct a search, update or add information to your Account, respond to surveys, post to community forums, provide us with feedback, participate in promotions, or use other features of the Services.

5.2 Data that indirectly identifies you and automatically collected data.

When you access or use the Services, we collect data that indirectly identifies you and we automatically collect other data about you, including:

- **Log Data.** We automatically receive and record information from your device or web browser when you interact with the Services. For example, we collect your internet protocol (IP) address, mobile device ID, time zone setting, language preference, operating system, platform, internet service provider (ISP), and links you have clicked on or shared with others, including through email and social media. If you sign up for an Account, we also create a user ID that indirectly identifies you. We use this information to collect data about your activities through the Services. We associate information that indirectly identifies you with your Account (if you have one) and other information we have collected about you.
- **Cookies.** When you visit the Services, we will set certain "cookies" and similar tracking technologies on your device, including cookies and web beacons. For more information about cookies and how to disable them, please see our "Cookie Policy" section below.

We also may use these technologies to collect data about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically may include personal data, or we may maintain it or associate it with personal data we collect in other ways or receive from third parties.

5.3 Location data.

We use your IP address to infer your approximate location. We may also collect the language option or country you choose. When we provide certain services, such as providing you with a version of our Services that is localized to your country, we link location data to other information we have collected about you in order to do so.

5.4 Profile data.

If you sign up for an Account, we will collect certain data you give us as part of your Account sign-up as described above, information you give us in connection with purchases or orders made by you, and your

interests, preferences, feedback and survey responses. Your interests and preferences are inferred from data we collect regarding what types of content you have interacted with, how long you interacted with them, how often you interacted with them, and the nature of your interaction with the content. We do not disclose email addresses to other users except where it is necessary to comply with the law, to protect our rights, or to protect the rights of our users.

5.5 Special category data.

When we conduct research or carry out surveys and you participate in our research or surveys, we may collect sensitive personal data about you, for example, information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life or sexual orientation. We will get your explicit consent for our collection, use, or sharing of this data as required by law.

6. Aggregated data

6.1 We analyze and aggregate personal data we collect, such as the number and frequency of your visits to the Services, to produce anonymized metrics and statistical information that does not identify you as an individual.

6.2 We combine information about you with information about other users to create audience segments of aggregated data, for example, statistical, demographic and usage data. If we combine or connect aggregated data with your personal data, we treat the combined data as personal data and deal with it in accordance with this Privacy Policy.

7. How we collect personal data

7.1 You may give us your personal data directly, for example when you create an Account, fund us by donation, support us by paying for a subscription, buy products or services, subscribe to our newsletters, opt-in to marketing communications, publish posts or comments, enter a competition, participate in a promotion or survey, ask for user support, or contact us for any reason.

7.2 We automatically collect personal data when you interact with our Services. We collect information about your devices and browsing actions and interests by using cookies and similar technologies. Our "[Cookie Policy](#)" section provides more details on how this works.

7.3 Third parties who provide advertising and related services (such as analytics providers and ad networks) may give us your personal data so that we can compare it to personal data we hold in order to determine if you are the same individual (this is sometimes called "cookie-matching"). We may collect data from unaffiliated third parties so we can better understand you and provide you with information and offers that may be of interest to you. For example, we may receive information about your interests or preferences as well as contact information, such as email address.

7.4 We may receive your personal data from third parties when you buy things through our Services or when you buy things from a third party after clicking on an affiliate link in our content. This information may include your contact details and financial and transaction data (such as items purchased and purchase price) from providers of technical, payment and delivery services.

7.5 If you access our Services using your Facebook or Google credentials, we will automatically collect certain information, such as your Facebook or Google user ID. We will use any information collected from Facebook or Google, including the user ID Facebook or Google attribute to you, only in accordance with Facebook's or Google's policies and your preferences selected through Facebook or Google.

7.6 What we use your data for:

We use the data we collect to provide, maintain, and improve our Services. We also use the data we collect to:

- Send you technical notices, updates, security alerts and support and administrative messages and to respond to your comments, questions and customer service requests;
- Communicate with you about products, services, offers, and events offered by BuzzFeed and others, and provide news and information we think will be of interest to you;
- Make inferences about your interests and preferences (including at a household level). Your interests and preferences are inferred from data we collect regarding what types of content you have interacted with, how long you interacted with them, how often you interacted with them, and the nature of your interaction with the content;
- Personalize and improve the Services and provide you with advertisements, content or features that match your profile, activities or interests;.
- Customize content that our third-party advertising partners deliver on the Services (such as personalized third-party advertising);
- Creating and updating profiles and audience segments that can be used for analytics, interested-based advertising and marketing on the Services, and on websites, mobile apps and other platforms controller by our advertisers and other third party advertising partners ("Third Party Sites")
- We may use information about you, such as your email address, to identify you across the devices you use to access the Services, as well as offline. This helps us learn more about your interests and preferences, which we use for advertising on the Services and Third Party Sites.
- Facilitate contests, sweepstakes and promotions and process and deliver entries and rewards;
- Monitor and analyze trends, usage and activities in connection with our Services and personalize and improve the Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of BuzzFeed and others; and
- Carry out any other purpose described to you at the time the data was collected.

8. Marketing choices

When you sign up for a promotion like a sweepstakes, or subscribe to or create an Account to use our Services, we use your personal data to help us decide which products, services and offers may be of interest to you. We will send marketing messages to you if you have asked us to send you information, bought goods or services from us, or if you provided us with your details when you entered a competition or registered for a promotion. If you opt out of receiving marketing messages, we may still send you non-promotional emails, such as those about your Account or our ongoing business relations. We will ask for your consent before we share your personal data with any third party for direct marketing purposes.

You may unsubscribe from marketing messages through a link we include on messages we send you. You can also ask us to stop sending you marketing messages at any time by contacting us at: data-privacy@buzzfeed.com

9. Sharing your personal data

In general, your personal data will remain with BuzzFeed but we may share personal data about you as follows or as otherwise described in this Privacy Policy:

- BuzzFeed We share your personal data within BuzzFeed's legal entities where necessary to fulfill a contract or precontractual measures, or where we have a legitimate interest in doing so or a legal obligation to do so. BuzzFeed's legal entities are listed in our "[BuzzFeed Legal Entities](#)" section;
- With vendors, consultants, and other service providers who process your data on our behalf when they provide services to us, for example data analytics, ad networks, research, marketing and financial services;
- With advertising partners ("Advertising Partners") to customize your experience and better tailor the services, products, marketing and advertising on our Services and on their Third Party Sites. Our advertising partners are companies that provide services that help us provide advertising to you. These companies may use their own tracking technologies to collect or request information about you, please see our "[Cookie Policy](#)" section.
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- We may be legally required to disclose or share your personal data without your consent in some circumstances, for example to comply with a court order or law enforcement. In such circumstances, we will only disclose your personal data if we have a good-faith belief that such sharing is required under applicable legal obligations.

Other Sharing

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you. For example, we may share aggregated or de-identified information with our ad partners and service providers so that we, and they, can understand how people use our Services; this helps us grow our business and improve and develop our products and services. We may also share information about you along with a hashed version of your email address with our Advertising Partners so that they and we can facilitate customized ad campaigns and other offers on the Services and on other platforms. "Hashing" transforms your email into an unrecognizable series of numbers and letters (e.g. a "hashed" version of jane@email.com would be k5f7g23@email.com).

10. UK and EU users: international transfer of your personal data

10.1 When we process your personal data within BuzzFeed, we will do so in countries in which we have offices (United States, India, Australia, Japan, Brazil, Mexico, Canada). We have put into place intra-group controls (including the standard contractual clauses approved by the European Commission) to ensure that your rights continue to be protected.

10.2 Third parties with whom we share your data may be based outside the EEA and their processing of your personal data may involve a transfer of data outside the EEA. For more information, please refer to the privacy policy links for such third parties in our consent management platform.

10.3 Our agreements with those third parties include Commission-approved standard contractual clauses and otherwise make clear the standards we expect of them in order to safeguard your information and your legal rights.

11. Retaining your personal data

11.1 We keep your personal data for as long as we need it for the purposes for which it was collected.

11.2 When we decide how long we will keep your information we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, why we need it, and any relevant legal requirements (such as legal retention and destruction periods).

11.3 We may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes.

12. Third-Party Sites

12.1 Our sites and apps may include links to third-party sites, apps and social media platforms ("Third-Party Sites"). Clicking on those links may allow third parties to collect or share data about you. We do not endorse or control Third-Party Sites, each of which may be governed by its own terms of service and privacy policy and we encourage you to read their privacy policies and terms so that you understand how they process information about you. You are solely responsible for all liability for any damages or other harm, whether to you or third-parties, resulting from your use of Third-Party Sites. Please take all protections necessary to protect yourself when accessing Third-Party Sites, particularly when downloading or purchasing anything therefrom.

12.2 The Services may offer social sharing features and other integrated tools, which let you share actions you take on our Services with other media, and vice versa. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. We also use the analytics tools provided by the social media platforms to help us to understand how people interact with our social media presence, to identify trends and to carry out joint promotional activities with those platforms. For example, sometimes we agree with a social media platform that we will jointly promote certain content.

We also use the analytics tools provided by the social media platforms to help us to understand how people interact with our social media presence, to identify trends and to carry out joint promotional activities with those platforms. For example, sometimes we agree with a social media platform that we will jointly promote certain content.

We receive aggregated statistical information from social media platforms about the performance of our posts and promoted content, such as numbers of views and kinds of viewers. This data is aggregated and anonymized by the social media platform prior to being made available to us.

We also use the paid advertising and paid content tools provided by the social media platforms to help us carry out advertising campaigns for our ad partners and to promote our content on the social media platforms. For example, we use the “Promoted Pins” tool on Pinterest to promote editorial or paid content to visitors to Pinterest. Again, we receive from the social media platforms only aggregated statistical information about interactions with our ads and paid content, such as number of views, number of times shared and so on.

We process information provided to us by the social media platforms on the basis of our legitimate interest in interacting with our audience on social media and using social media to promote our content.

For more information about the purpose and scope of data collection and processing in connection with social sharing features or your use of the social media platforms, please visit the privacy policies of the respective entities at the following links:

- Facebook and Instagram - <https://en-gb.facebook.com/policy.php>
- Twitter - <https://twitter.com/en/privacy>
- YouTube - <https://policies.google.com/privacy?hl=en>
- Snapchat - <https://www.snap.com/en-US/privacy/privacy-center/>
- Twitch - <https://www.twitch.tv/p/legal/privacy-policy/>
- TikTok - <https://www.tiktok.com/en/privacy-policy>
- Pinterest- <https://policy.pinterest.com/en/privacy-policy>
- Tumblr - <https://www.tumblr.com/privacy>
- LinkedIn - <https://www.linkedin.com/legal/privacy-policy>
- LINE - https://terms.line.me/line_rules

13. Cookie policy

13.1 Cookies are small data text files that are sent from a server during a browsing session. Cookies are typically stored on your computer’s hard drive and are used by web sites to simulate a continuous connection to that site. The use of cookies automatically identifies your browser whenever you interact with a site. A “web beacon,” also known as a tag, pixel tag, or clear GIF, is used to transmit information back to a web server. When we talk about “cookies” in this Privacy Policy, we mean not just cookies, but web beacons and similar technologies.

Cookies and similar technologies allow us to collect the following types of personal data: a unique ID assigned to your device; IP address; device and browser type; operating system; referring URLs; content viewed or other actions taken through our Services; time and date of those actions; country and language selected.

Browsers and devices have tools that allow you to disable cookies on sites and apps. If you disable cookies you may not be able to access all the features of our services. We suggest that you keep our essential cookies (described below) active for a better user experience and to help us keep improving and developing our products and services.

13.2 Our Services use our own cookies to recognize you and remember you as a unique user.

- **Session cookies** remember you during your session on our Services. They are deleted when you log out of the Services and when you close your web browser. Session cookies are used to ensure you are served content correctly, to balance and monitor load on our servers, and for other technical matters essential to the operation of our Services. You can configure your device to reject these cookies, but our Services will probably not work correctly, or at all, if you do.
- **Consent cookies** are used by our consent management platform we employ to record your preferences about third party cookies described below, and to store and share your preference with those third parties. These cookies are essential for compliance with the legal obligations imposed on us and on third parties with whom we have a business relationship to ensure we request your consent, record your consent preferences, and act on such consent preferences.

13.3 Analytics cookies

Analytics cookies are used by us and by third parties who process data for us for data analytics purposes (for example Google Analytics) so that we can manage and improve the performance and design of our Services and for monitoring, auditing, research and reporting.

We have activated Google's IP anonymisation function on our Sites. This will cause your IP address to be cut by Google within Member States of the European Union or in other countries party to the Agreement on the European Economic Area before being transmitted to the USA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On our behalf, Google will use this information to evaluate your use of the Sites, to compile reports on Site activity and to provide us with other services relating to website and internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

With respect to Google Analytics, you can read about how Google uses data gathered for that purpose [here](#).

13.4 Third party cookies: advertising and affiliate links

Our ad partners and our affiliate links partners collect personal data from you for the purposes they disclose through our cookie consent management platform.

- Ad partners include ad networks such as third party ad servers, ad agencies, ad technology vendors and research firms.
- Affiliate links partners pay us when you buy things from them or another third party after clicking on an affiliate link in our content.

Our ad partners use third party cookies to serve ads to you and to target you with tailored (or personalized) ads when you are using the Services and when you visit Third-Party Sites. They also use cookies to measure traffic on the Services (for example to track ad views).

Ad partners and affiliate links partners may view, edit or set their own cookies on your mobile device or web browser when you interact with our Services. They use cookies to track your use of our Services and your activities elsewhere online. We are not responsible for the privacy practices of these third parties and we

encourage you to read their privacy policies so that you understand how they process information about you. We provide links to their privacy policies in our consent management platform, which you can access by [here](#).

You can decide who you will allow to set these third party cookies on your browser or device by going to our [consent preferences center](#). You can change your mind and revisit your consent choices at any time by returning there.

14. Privacy information for EEA and UK users

14.1 Information for UK/EU Users (including legal bases)

We will use your personal data only for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal data for another purpose, we will explain the legal basis we rely on.

The table below shows what we use your personal data for and the lawful basis for processing it in each case.

Purpose	Type of data	Lawful basis
Recognize you and analyze how you, and other users, navigate the Services and apps and what type of content you're interested in, and to manage and improve the Services by testing new features of our sites and apps. We do this by using cookies or similar technology as explained in our " Cookie Policy " section.	Data that indirectly identifies you such as your IP address, mobile device ID and location data. This data does not include anything that allows us to identify you by name or contact details.	Legitimate interest.
Recognize you and analyze how you, and other users, interact with ads on our Services and what type of ads you're interested in. We do this by using cookies or similar technology as explained in our " Cookie Policy " section.	Data that indirectly identifies you such as your IP address, mobile device ID and location data. This data does not include anything that allows us to identify you by name or contact details.	Consent.
Communicate legal information to you.	Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and data that directly identifies you (such as your name, username, and email address and information you include in your user profile).	Legitimate interest.

Purpose	Type of data	Lawful basis
Analyze comments and feedback you have given us including comments, feedback and reviews you have posted on our Services in order to use the information to carry out journalistic activities, to improve our services and content offerings, and to enforce our Terms of Service.	Data that directly identifies you (such as your name, username, and email address) and data that indirectly identifies you (such as your IP address or mobile device ID and location data).	Legitimate interest.
Provide you with communications and services you've signed up, for such as our newsletters.	Data that directly identifies you such as your name, username, email address and location data.	Consent.
Register you as a user of our Services and other products and services and administer your Account.	Data that directly identifies you (such as your name, username, and email address and other information included in your user profile).	Creation or performance of a contract.
Publish content on our Services including articles, feedback, reviews and user comments about our posts.	Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and data that directly identifies you (such as your name, username, and email address and information included in your user profile).	Creation or performance of a contract.
Fulfill orders for subscriptions, products or services placed through our Services.	Data that directly identifies you including your name and address, email address, other contact details, financial and transactional data.	Creation or performance of a contract.
Collect money you owe us.	Data that directly identifies you including your name and address, email address, other contact details, financial and transactional data.	Legitimate interest.
Verify or obtain payments due to us when you buy something from a third party after clicking on an "affiliate" link in our content, measure the performance of affiliate links, analyze and develop this part of our business.	Data that indirectly identifies you (such as your IP address or mobile device ID) or data that directly identifies you (such as your name, username, email address and location data).	Legitimate interest.

Purpose	Type of data	Lawful basis
Communicate our terms, notify you about changes to them and communicate with you about non-compliance.	Data that indirectly identifies you (such as your IP address or mobile device ID and location data) or data that directly identifies you (such as your name, username and email address).	Creation or performance of a contract.
Communicate our Privacy Policy and notify you of changes to them	Data that indirectly identifies you (such as your IP address or mobile device ID and location data) or data that directly identifies you (such as your name, username, and email address).	Compliance with a legal obligation.
Conduct surveys or undertake similar types of research so that we can improve and develop our business, our Services.	Data that directly identifies you (such as your name, username, name, email address and location data)	Consent.
Allow you to take part in a prize draw, sweepstake, or other competition or other promotional activity.	Data that directly identifies you such as your name, username, and email address.	Creation or performance of a contract.
Administration and protection of our business including troubleshooting, data analysis, testing, system maintenance, user support, reporting and hosting data, administration and IT services, network security, fraud prevention, customer services and business reorganization, including exchanging information with third parties for fraud protection and spam/malware prevention.	Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and data that directly identifies you (such as your name, username, and email address).	Legitimate interest.
Send marketing communications to you if you subscribe to our newsletters or other products and services. We explain how we comply with the law and how you can manage your preferences in our “Marketing choices” section.	Data that directly identifies you such as your name and email address.	Consent

Purpose	Type of data	Lawful basis
Communicate with you about our services that you sign up to receive when you create an Account and transactions that you conduct using our services, including published content you visit, content you submit for publication on buzzfeed.com, and content posted by you on buzzfeed.com (including your comments on content, feedback and reviews).	Data that directly identifies you such as your name and email address.	Creation or performance of a contract
Comply with applicable laws, regulations and legal and regulatory processes.	Data that indirectly identifies you (such as your IP address or mobile device ID and location data) and/or data that directly identifies you (such as your name, username, and email address).	Creation or performance of a contract

14.2 Legal rights for EEA and UK users

If you are an EU or UK resident, you have certain rights in respect of the information that we hold about you. Below is a short overview of those rights:

- **Access.** With some exceptions designed to protect the rights of others, you have the right to a copy of the personal data that we hold about you. Where the data is data that you have given to us, you have the right to receive your copy of it in a common electronic format, and to provide copies of it to other people if you wish.
- **Correction.** You have the right to have the personal data we hold about you corrected if it is factually inaccurate. This right does not extend to matters of opinion, such as views expressed in editorial content.
- **Deletion.** In some limited circumstances, you have the right to have personal data that we hold about you erased (the “right to be forgotten”). This right is not generally available where we still have a valid legal reason to keep the data (for example, because we are obliged to do so by law).
- **Objection.** You have the right to object to our processing of your personal data where we rely on “legitimate interests” as our legal basis for processing, but we may be able to continue processing if our interest outweighs your objection.
- **Withdrawing consent.** If we are processing your personal data on the basis of your consent, you have the right to withdraw that consent at any time, in which case we will stop that processing unless we have another legal basis on which to continue.

14.3 How to exercise your rights

To exercise your rights, email data-privacy@buzzfeed.com. In order to protect your privacy and that of others, we will ask you to prove your identity before we take any steps in response to a request you have made. If a third party is making a request on your behalf, we will ask them to prove that they have your permission to act for you.

We may contact you to ask you for further information to help you exercise your legal rights or to speed up our response. We will try to respond to requests within one month and we will let you know if we need to take longer, for example because your request is complicated. We may have an overriding lawful basis for processing your personal data, or certain exemptions may apply. If we refuse your request, we will explain why.

14.4 Complaints

You have the right to complain about data privacy matters to the Information Commissioner's Office (www.ico.org.uk), or the relevant data protection regulator in your country of residence. You can contact the ICO on 0303 123 1113. We invite you to raise your concerns with us first, so that we can try to resolve them.

14.5 EU Representative

We have appointed IT Governance Europe Limited to act as our EU representative. If you wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR) or have any queries in relation to your rights or general privacy matters, please email our Representative at eurep@itgovernance.eu. Please ensure to include our company name in any correspondence you send to our Representative.

15. Privacy Information for California Residents

15.1 California Privacy Rights

This section provides you with our practices regarding the collection, use, and disclosure of your personal data in the 12 months prior to our last update to this Policy (see the date at the top). It also explains your rights regarding your personal data that we collect (as set forth in the California Consumer Privacy Protection Act or the "CCPA").

Categories of Information We Collect:

- **Your contact details** (e.g. your name, address, email address, telephone number and username).
- **Payment information** (e.g. bank account number, credit card number, debit card number, or any other financial information).
- **Demographic information** (e.g. race, ethnic origin, religion, or sexual orientation).
- **Purchase history & preferences** (e.g. records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies).
- **Internet activity information** (e.g., browsing history, search history, information on a consumer's interaction with a website, application, or advertisement, or questions and other messages you address to us directly through online forms or by email).
- **Inferences** (e.g. inferences about your about personal preferences and attributes drawn from profiling).
- **Online identifiers** (e.g. IP address, ADID/IDFA, cookie IDs, internal identification numbers).
- **Location data** (e.g. your city, state or country information).
- **Application information** (for job applicants) (e.g. your passport number, driver's license or other state identification card number, education, and employment information)

Categories of Sources:

- You
- Your device
- Data partners.

Purpose of Collection

- To communicate with you, including to process your requests for products/services and/or information.
- To register your Account.
- To improve our Service, including to better understand our customer base, meet our diversity and inclusion goals; and to help our business partners do the same.
- To enforce our User Agreement, and for the administration and protection of our business.
- To comply with applicable law, regulations, and legal and regulatory processes.

If you opt-in to do so, we may use your name and email address for our marketing purposes and to help our business partners with their marketing.

Disclosure or Sale of Personal Information

Categories of Information Disclosed or

Sold:

Categories of Vendors or Other Entities We Share Information With:

Your contact details	Our email service vendors, sweepstakes/promotions partners, social network partners, other vendors who assist in providing services on our behalf, and our business partners.
Payment information	Our payment processing vendors.
Demographic information	Our research and survey vendors, and our advertisers and other business partners.
Purchase history & preferences	Our affiliate partners, and other vendors who assist in providing services on our behalf.
Internet activity information, inferences and online identifiers	Advertising networks, internet service providers, data analytics vendors, operating systems and platforms, and social networks.
Location data	Internet service providers, data analytics vendors, operating systems, and platforms.

We may share your personal data with government entities when required to do by law.

If you are a California resident, you have the right to know what personal data we collect, disclose, and “sell” about you (as that term is used in the CCPA). Additionally, you have the right to access, delete and opt out from the “sale” of your personal data. Specifically, California residents may request that we:

- Inform you about the categories of personal data we collect or disclose about you; the categories of sources of such data; the business or commercial purpose for collecting your personal data; and the categories of third parties with whom we share/disclose personal data. Such information is also set forth above in this Privacy Policy.
- Provide you access to and/or a copy of the specific pieces of personal data we collected about you (also called a data portability request)
- Delete certain personal data we have about you.

The CCPA further provides you with the right to not be discriminated against (as provided for in applicable law) for exercising your rights.

Note for non-California residents: We will seek to honor requests to exercise the above rights made by non-California residents to the extent required by applicable law.

Please note that certain data may be exempt from such access, data portability, and deletion requests under California law. For example, we need to retain certain data in order to provide the Services to you.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal data. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or deletion twice within a 12-month period.

If you have a registered account with us, you can submit your access or deletion request by signing into your account. You can find instructions on how to proceed at our [consent preferences center](#)

If you do not have a registered account, please visit our [consent preferences center](#) or contact us at data-privacy@buzzfeed.com, and we will provide you with instructions on how to submit your request.

Please note that the verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request and confirm the personal data relates to you. Making a verifiable consumer request does not require you to create an Account with us. We will only use personal data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

15.2 California Notice of Right to Opt-Out of "Sale"

California residents may opt out of the "sale" of their personal data. California law broadly defines "sale" in a way that may include allowing third parties to receive certain data, such as cookies, IP address, and/or

browsing behavior, to deliver targeted advertising on our Services or other sites and apps. Advertising, including targeted advertising, enables us to provide you certain content for free and allows us to provide you content relevant to you.

Depending on what Services you use, we may sell (as defined by California law) the following categories of data for such advertising purposes:

- Online Identifiers and internet activity information
- Contact details
- Purchase history & preferences
- Demographic information
- Inferences about personal preferences and attributes drawn from profiling

If you would like to opt out of our use of your personal data for such purposes, you may do as outlined on the following page: "[Do Not Sell My Personal Information](#)" or by contacting us at data-privacy@buzzfeed.com. This will cause data to cease to be added to any cookies or other tracking technologies that have been set on our Services or block them entirely. Please note that you will need to opt out again if you visit one of our Services from a different device or browser or if you clear your cookies. Please note that we do not knowingly sell the personal data of minors under 16 years of age without legally-required affirmative authorization.

15.3 Statistics on California Consumer Requests We Receive

The CCPA requires BuzzFeed to provide metrics on the number of requests we have received each year from California consumers and how they have been fulfilled. This information can be found in the chart below.

Requests Submitted 1/1/20-12/31/20*	# Requests Received	# Complied with in Whole or Part	# of Requests Denied	Mean # of Days to Respond to Request
Requests to Access	1473	1473	0	1
Requests to Delete	310	310	0	7
Requests to Opt Out	57	57	0	16

*Note: The numbers above reflect requests received from all individuals, rather than requests received from California consumers only.

15.4 California Shine the Light Disclosure

Under California Civil Code sections 1798.83- 1798.84, California residents are entitled to ask for a notice identifying the categories of personal customer data which we share with our affiliates and/or third parties for

their own direct marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: 111 E. 18th Street, New York, NY 10003, Attn: Office of the General Counsel.

16. BuzzFeed legal entities

- BuzzFeed, Inc.
- BuzzFeed Canada, Inc
- BuzzFeed UK Limited
- BuzzFeed GmbH (Germany)
- BuzzFeed India Private Limited
- BuzzFeed PTY, Ltd (Australia)
- BuzzFeed Japan Corporation
- Entertainment Contents Online Mexico, S.A. de C.V.
- BuzzFeed Motion Pictures Inc.
- Product Labs, Inc.
- Torando Labs, Inc.
- Lexland Studios, Inc (formerly known as BFMP Video, Inc.)
- The HuffingtonPost.com, Inc.